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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

Joseph Eugene Piovo, Sui juris, Individually
and as Beneficiary of Vice Roy United Nations
Credit and Commerce International Blind Trust
1853 Indian Bend Drive
Henderson, Nevada 89074
APN:178-17-911-009

Plaintiff,

vs.

ROBERT STONE;
RONALD A. COLQUITT;
MICHELLE WILSON;
ANTONIETA TOVAR-GUZMAN;
SHAUNA S. BRENNAN;
CBSK FINANCIAL GROUP, INC.;
CHICAGO TITLE;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.; A/K/A
MERS;
MERSCORP HOLDINGS, INC.; A/K/A
MERSCORP, INC.;
U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE, SUCCESSOR IN INTEREST TO
BANK OF AMERICA, NATIONAL
ASSOCIATION AS SUCCESSOR BY
MERGER TO LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
CERTIFICATEHOLDERS OF BEAR
STERNS ASSET BACKED SECURITIES I
LLC, ASSET BACKED CERTIFICATES,
SERIES 2006-HE8;

Does 1-100 inclusive;

Defendants

No. 2:13-cv-01922-APG-GWF

**SECOND AMENDED VERIFIED
PETITION FOR DECLARATORY
RELIEF AND COMPLAINT FOR
FEDERAL CIVIL RIGHTS
VIOLATIONS**

1 Plaintiff, Joseph Eugene Piovo, (hereinafter "Joseph Eugene Piovo", "Piovo" or
 2 "Plaintiff") Golden Age Senior Citizen and African American complaints against all defendants
 3 hereby and alleges as follows:

4 **NATURE OF THE ACTION**

5 **CIVIL RIGHTS CONSPIRACY: DEPRIVATION OF CIVIL RIGHTS**

6 **CIVIL RIGHTS ACT OF 1866, 14 STAT. 27 (A 1868 CONSTITUTIONALITY) and 42**

7 **U.S.C. SECTION 1982**

8 Plaintiff, Joseph Eugene Piovo's Property Rights of Citizens was unlawfully deprived by
 9 Civil Rights Conspiracy Coconspirators and by such Civil Rights Conspiracy Coconspirators'
 10 concert of action with the intent to and in furtherance thereof by concert of action of two or more
 11 Joint Principals Coconspirators cause Government-Insured Financial Enterprises to part with
 12 money, Piovo is egregiously placed against his will in harm's way by way of identity theft and
 13 such deprivation is: in direct violation of the Identity Theft and Assumption Deterrence Act,
 14 Identification Fraud 18 U.S. Code Section 1028 (a) (2), the Anti Civil Rights Joint Principals
 15 Coconspirators stealing of Piovo's Assessor's Parcel Number 178-17-911-009 (hereinafter
 16 "APN") and 18 U.S.C. Section 1028 Identification Document(s) and Information APN equal
 17 protection under the law automatically causes the deprivation of Piovo's free flowing Civil
 18 Rights whereby Joseph Eugene Piovo is afforded equal protection under the laws of the United
 19 States in particular the 18 U.S.C. Section 1028 violations and violations of Civil Rights Act of
 20 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982. Property Rights of Citizens are indissoluble
 21 Civil Rights Equal Protection under the law *oneness intent* links each act and laws to one
 22 another, by an inseparable Civil Rights act of necessity that by their indisputable least common
 23 denominator, Equal Protection Under the Law, each their nature and scope beyond a shadow of a

1 doubt necessarily attaches each their Civil Rights Equal Protection Under The Law to Joseph
2 Eugene Piovo, instilled with every privilege of freeborn citizens, to his free flowing Civil Rights
3 Property Rights of Citizens, in that the APN being the one and only Civil Rights Acts
4 Identification Document(s) and Information, the Assessor's Parcel Number 178-17-911-009,
5 hereinafter shall be known as Piovo's Civil Rights Identification Document(s) and Information
6 APN beyond a reasonable doubt as the Civil Rights fiduciary duty as Property Rights of Citizens
7 Identification Document(s) and Information APN, and Civil Rights Conspiracy Joint Principals
8 Coconspirators 18 U.S.C. Section 1028 theft thereof, with the intent to in furtherance thereof by
9 concert of action of two or more Joint Principals Coconspirators cause Government-Insured
10 Financial Enterprises to part with money.

11 The Joint Principals Civil Rights Conspiracy Coconspirators knowing and willful
12 agreement to steal Piovo's Civil Rights Identification Document(s) and Information APN with
13 the intent to in furtherance thereof by concert of action of two or more Joint Principals
14 Coconspirators cause Government-Insured Financial Enterprises to part with money involving
15 any rights or obligations that arise from the Constitution and/or other federal law indissoluble
16 links itself to (1) Joseph Eugene Piovo, (2) Civil Rights Act of 1866 14 Stat. 27 (1866) and (3)
17 42 U.S.C. Section 1982 Property Rights of Citizens, thus being the case as the case is all Joint
18 Principals Coconspirators Civil Rights Conspiracy by concert of action the Joint Principals
19 Coconspirators herein, did knowingly and willfully combine, conspire, and agree with others
20 known and unknown to Piovo, deprive Piovo the proper Citizen, of his Civil Rights Act of 1866
21 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, the Joint Principals
22 Direct Endorsement Lenders, Chicago Title, Robert J. Stone information, original federal court
23 jurisdiction case 2:09-cr-00216-jcm-pal violation: 18 U.S.C. Section 371 conspiracy filed on

1 06/04/09, Ronald A. Colquitt, Antonieta Tovar-Guzman, and other Coconspirators herein, did
2 knowingly and willfully combine, conspire, and agree with others known and unknown to Piovo,
3 to by Civil Rights Conspiracy commit Civil Rights Violations, that is, to devise a scheme and
4 artifice to steal property under the custody and control of Piovo, by interfering with Piovo's free
5 flowing Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 by means of
6 false and fraudulent pretenses, representations, being and acting as Joseph Eugene Piovo, inter
7 alia did knowingly and willfully combine, conspire, and agree with others known and unknown
8 to Piovo, to stop his free flowing Fourteenth Amendment to the United States Constitution equal
9 protection under the Constitution the laws and treaties of the United States.

10 The Joint Principals Coconspirators' deprivation of Piovo's Substantive Civil Rights
11 Property Rights of Citizens Identification Document(s) and Information APN in violation of 18
12 U.S.C. Section 1028 along with the Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C.
13 Section 1982 Property Rights of Citizens, automatically grants the Federal Courts Subject Matter
14 Jurisdiction, too the selfsame Property Rights of Citizens attaches Federal Courts Subject Matter
15 Jurisdiction over all Civil Rights Conspiracy Coconspirators' concert of action in furtherance of
16 any and all Civil Rights Conspiracy related Civil Rights incidences that Piovo's equal protection
17 under Civil Rights Laws affixed thereto by the Civil Rights Property Rights of Citizens,
18 whereby, all citizens of the United States shall have the same right, in every State and Territory,
19 as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and
20 personal property.

21 42 U.S.C. Section 1982 Property Rights of Citizens

22 "All citizens of the United States shall have the same right, in every State and
23 Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell,
24 hold, and convey real and personal property."

1 Federal Court Property Rights of Citizens Subject Matter Jurisdiction affords to Joseph
 2 Eugene Piovo his Equal Protection under the Civil Rights Property Rights of Citizens a remedy
 3 for injuries he suffers by the Civil Rights Conspiracy Joint Principals Coconspirators in
 4 furtherance of their anti Civil Rights incidences related to Piovo's Civil Rights of equal
 5 protection under the law afforded to the lawful Citizen affixed thereto the Civil Rights Property
 6 Rights of Citizens, whereby, Federal Courts Subject Matter Jurisdiction affords to Piovo's Anti
 7 Civil Rights Case In Chief to be argued in the Civil Rights of Citizens in this Federal Court
 8 Venue, means Piovo's now filed Second Amended Complaint to be heard in this Federal Court
 9 Venue is at the core of what Piovo's deprivation of his Civil Rights Act of 1866 14 Stat. 27
 10 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens Rights, *which is at the core of*
 11 *this case*, once removed from Piovo deprives Piovo of his quintessential Identification
 12 Document(s) and Information APN that substantively attaches Piovo to his free flow of Civil
 13 Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens,
 14 and when stolen Piovo's Civil Rights Guarantees are strangled and stopped.

15 The Joint Principals Coconspirators stole Piovo's Civil Rights Identification Document(s)
 16 and Information with the intent to transfer both the Title and Ownership of Joseph Eugene
 17 Piovo's Real Property, as is set out in Plain English within the body of his Second Amended
 18 Complaint as to what the Civil Rights Conspiracy Harm actually is, because a lawful transfer to
 19 Joseph Eugene Piovo's APN Civil Rights Identification Document(s) and Information shows the
 20 name of Joseph Eugene Piovo as the lawful and rightful Real Property Holder, to the contrary, in
 21 this Case in Chief Piovo's Civil Rights Identification Document(s) and Information is stolen and
 22 fraudulently transferred from Piovo in violation of 18 U.S.C. Section 1028, over to at least one of
 23 the Joint Principal Coconspirators herein, all Joint Principals Coconspirators did knowingly and

1 willfully by means of false and fraudulent pretenses, and representations and misrepresentation
2 as being Joseph Eugene Piovo, by means of false and fraudulent pretenses, and representations
3 renders Piovo's Civil Rights Identification Document(s) and Information *Quintessential* and
4 *Substantive Anti Civil Rights Essential Element* is the object of the Civil Rights Conspiracy that
5 the Coconspirators use to place Piovo, the victim, in harm's way at a material disadvantage, for
6 lack thereof his, inter alia, Civil Rights Guarantee of equal protection under the federal law.

7 The Civil Rights Conspiracy Coconspirators by concert of action did knowingly and
8 willfully combine, conspire, and agree with others known and unknown to Piovo to commit Anti
9 Civil Rights Conspiracy Violations to steal Piovo's Civil Rights Identification Document(s) and
10 Information, in that the Civil Rights Conspiracy Coconspirators herein would knowingly and
11 willfully combine, conspire, and agree with others to join in the *agreement to commit the Civil*
12 *Rights Conspiracy harm* to each of their Joint Principals Civil Rights Conspiracy Performance in
13 the Joint Principals Direct Endorsement Lenders, and Chicago Title and other Joint Principals
14 influenced and led premeditated diabolical Anti Civil Rights scheme and artifice with the intent
15 to wrongfully deprive Piovo of his free flow of Civil Rights Act of 1866 14 Stat. 27 (1866) and
16 42 U.S.C. Section 1982 Property Rights of Citizens. The Civil Rights Act of 1866, 14 Stat. 27-30
17 enacted on April 9, 1866, was the first United States Federal Law to identify, describe, and
18 define US citizenship and affirmed that all citizens were equally protected under and by the law.
19 It was mainly intended to protect the Civil Rights of African-Americans. After the Civil Rights
20 Act of 1866 had been enacted into law members of Congress voted for the Fourteenth
21 Amendment in order to eliminate doubts about the constitutionality of the Civil Rights Act of
22 1866.

Substantive Abilities of Federal Subject Matter Jurisdiction, circumstantially stated in substance and in part in their own words contained within the context and content within the body of sworn depositions, Sworn Affidavits of Truths, that in substance and in part pertains to acts constituting federal Civil Rights violations.

THE PARTIES

1. Plaintiff, Joseph Eugene Piovo (hereinafter, "Joseph Eugene Piovo", "Plaintiff" or "Piovo"), is a Golden Age senior Citizen, African American and Beneficiary of Vice Roy United Nations Credit and Commerce International Blind Trust (hereinafter "Vice Roy") at all times relevant to this complaint has been a resident in real property located at 1853 Indian Bend Drive, Henderson, Nevada 89074, APN:178-17-911-009 with the legal description of:

Parcel (1)

Lot 9 in Block h A" of Amended Plat of Legacy Highlands, as shown by map thereof on file in Book 48 of Plats, Page 18 in the Office of the County Recorder of Clark County, Nevada,

Parcel (2);

A non-exclusive right of ingress, egress and enjoyment in, to and over those areas depicted as private drives, p.u.e. and common areas on the above described plat and as shown on the amended Official Plat of Lots 28 through 39 and 52 through 61, Block B of Legacy Highlands, as shown by map thereof on File in Book 50 of Plats, Page 58 and the amended Official Plat of Lots 16 through 19, Block A of Legacy Highlands, as shown by map thereof on File in Book 53 of Plats, page 13, in the Office of the County Recorder of Clark County, Nevada.

Assessor's Parcel No: 178-17-811-009.

Plaintiff is a lawful owner of the property. Plaintiff is the "Grantee" on a Grant Deed recorded on November 14, 2005, under Instrument No. 20051114-0005356, referencing APN 178-17-811-009, with the Clark County Recorder's Office. The Grant Deed is incorporated herewith as **Exhibit A**. Plaintiff grants this court jurisdiction pursuant to Civil Rights Act of 1866, 14 Stat. 27 (1866) and 42 U.S.C. Section 1982.

1 2. Civil Rights Conspiracy Defendant, ROBERT STONE (hereinafter "Stone" or
2 "Robert Stone") is a convicted felon, a coconspirator, who is charged and prosecuted by the
3 United States Attorney for the District of Nevada for conspiracy to defraud under 18 U.S.C. §371
4 and 18 U.S.C. §1344. The object of the conspiracy is for Stone and others to obtain money and
5 property by fraudulently obtaining mortgages through straw buyers to purchase houses in
6 Nevada. Robert Stone is directly involved in similar scheme for which he is convicted, Stone
7 facilitates and perpetrates the purchase and sale of Plaintiff's property through a straw buyer and
8 others known and unknown Civil Rights Conspiracy coconspirators conspire to deprive Plaintiff
9 of his Civil Rights. From or about 08/03/2006 Robert J. Stone Jr. official residence was 1416
10 Belmont Park Road Oceanside, CA 92057, See **Exhibit G**: the address on face of, GRANT,
11 BARGAIN, SALE DEED, shows proof that this incident involves dispute among citizens of
12 different states establishes diversity of citizenship although not required to be proven since
13 jurisdiction is granted to the court by and through the Civil Rights Act of 1866 14 Stat. 27 (1866)
14 and 42 U.S.C. Section 1982, thus bursting the bubble approach to presumption of non original
15 Federal Courts Personal Jurisdiction.

16 Robert Stone violates Plaintiff's Federal Civil Rights which grants Plaintiff claim for
17 Federal jurisdiction upon which relief can be granted. The second amended complaint will be
18 served upon Stone at his currently known address at 659 E. 660 North, Orem, UT 84091. Stone's
19 indictment is incorporated herewith as **Exhibit B**.

20 3. Civil Rights Conspiracy Defendant, RONALD A. COLQUITT, (hereinafter
21 "Colquitt" or "Ronald Colquitt") a Civil Rights Conspiracy Coconspirator, an attorney in
22 Henderson Nevada, Nevada Bar Number 4953, currently practicing law in the State of Nevada,
23 violates Plaintiff's Federal Civil Rights which grants Plaintiff's claim for Federal jurisdiction

1 upon which relief can be granted, Colquitt is directly involved in the scheme and conspiracy
2 between Stone, Guzman, Chicago Title and CBSK who is known as a "Direct Endorsement
3 Lender", and others known and unknown Civil Rights Conspiracy coconspirators conspire to
4 deprive Plaintiff of his Civil Rights. Last known address for Ronald Colquitt is 42 S. Water
5 Street, Suite B, Henderson, NV 89015.

6 4. Civil Rights Conspiracy Defendant, Michelle Wilson (hereinafter "Wilson" or
7 "Michelle Wilson") is a real estate appraiser, a coconspirator, violated Plaintiff's Federal Civil
8 Rights which grants Plaintiff's claim for Federal jurisdiction upon which relief can be granted,
9 Wilson acts as Stone's agent, Wilson participated together with coconspirator Robert Stone, and
10 coconspirator Ronald Colquitt and others known and unknown Civil Rights Conspiracy
11 coconspirators conspire to deprive Plaintiff of his Civil Rights. Last known address for Michelle
12 Wilson is 1320 Fairchild St. Las Vegas, NV 89110.

13 5. Civil Rights Conspiracy Defendant, ANTONIETA TOVAR-GUZMAN,
14 (hereinafter "Guzman" or "Tovar-Guzman"), a Civil Rights Coconspirator, deprive Plaintiff's
15 Federal Civil Rights which grants Plaintiff's claim for Federal jurisdiction upon which relief can
16 be granted, Guzman acts as a straw buyer and participates together with Coconspirator Robert
17 Stone, Coconspirator Ronald Colquitt and others known and unknown Civil Rights Conspiracy
18 coconspirators conspire to deprive Plaintiff of his Civil Rights. Last known address for Antonieta
19 Tovar-Guzman is 1211 S. Merrill, Corona, California 92882. The Second Amended Complaint
20 will be served on Tovar-Guzman through her counsel Shauna Brennan.

21 6. Civil Rights Conspiracy Defendant, SHAUNA BRENNAN, (hereinafter
22 "Brennan" or "Shauna Brennan") an attorney in Las Vegas Nevada, Nevada Bar Number 6235,
23 violated Plaintiff's Federal Civil Rights which grants Plaintiff's claim for Federal jurisdiction

1 upon which relief can be granted, Brennan is currently practicing law in the State of Nevada, is
2 directly involved in the scheme and conspiracy to cover up acts of Guzman and places Plaintiff
3 in fear through written *threat of a law suit* against Plaintiff.

4 7. Civil Rights Conspiracy Defendant, CBSK FINANCIAL GROUP, INC. DBA
5 AMERICAN HOME LOANS (hereinafter "CBSK") is a "Direct Endorsement Lender" violates
6 Plaintiff's Civil Rights which grants Plaintiff's claim for Federal jurisdiction.

7 CBSK acts as a "Kingpin" in a Civil Rights Conspiracy with sufficient intent to in
8 furtherance thereof by concert of action of two or more Joint Principals Coconspirators cause
9 Government-Insured Financial Enterprises to part with money involving any rights or obligations
10 that arise from the Constitution and/or other federal law indissoluble links itself to (1) Joseph
11 Eugene Piovo, (2) Civil Rights Act of 1866 14 Stat. 27 (1866) and (3) 42 U.S.C. Section 1982.
12 All such Civil Rights Conspiracy Coconspirators' related acts committed in the past present and
13 in the future by the Civil Rights Conspiracy membership, and/or to be committed in the future by
14 the past present and future membership all their related past present and future federal acts shall
15 be deemed to arise under Federal Law Civil Rights Act of 1866, 14 Stat. 27 (1866) and 42
16 U.S.C. Section 1982, Federal Jurisdiction ONLY. CBSK together with Civil Rights Conspiracy
17 Coconspirator Chicago Title participated together with Civil Rights Conspiracy Coconspirators
18 Guzman, Colquitt and others known and unknown Civil Rights Conspiracy Coconspirators
19 conspired to deprive Plaintiff of his Civil Rights.

20 CBSK as a mortgage lender was conducting residential mortgage lending and/or
21 servicing of loans. CBSK approved the loan to a Civil Rights Conspiracy Coconspirator Guzman
22 that resulted in the theft of Plaintiff's APN in violation of Plaintiff's Civil Rights. The last
23 known corporate address for CBSK is 17991 Cowan, Irvine, CA 92614. No known Registered

1 Agent exists for CBSK. California Secretary of State Website printout is incorporated herewith
2 as **Exhibit C**. On October 9, 2007, Pursuant to Section 50319 of California Financial Code,
3 Preston Dufauchard, California Corporations Commissioner issued an Order to CBSK to
4 Discontinue Residential Mortgage Lending and/or Servicing Activities. The order is incorporated
5 herewith as **Exhibit D**. And on November 5, 2007, California Corporations Commissioner
6 issued an Order Summarily Revoking CBSK lending/servicing license. The order is incorporated
7 herewith as **Exhibit E**. In addition Nevada Secretary of State permanently revoked CBSK as
8 well. CBSK claims an interest in the Plaintiff's property through a recorded Deed of Trust given
9 to CBSK by Tovar-Guzman. The recorded Deed of Trust is incorporated herewith as **Exhibit F**.
10 The second amended complaint will be served upon two known officers of CBSK, one
11 CHARLES "BRENT" MCELWEE, President and CYNTHIA MCELWEE, Secretary residing at
12 26121 Calle Roberto, San Juan Capistrano, CA 92675-3059.

13 8. Civil Rights Conspiracy Defendant, CHICAGO TITLE, (hereinafter "Chicago
14 Title") a Coconspirator, violated Plaintiff's Federal Civil Rights which grants Plaintiff a claim
15 for Federal jurisdiction. Chicago Title acts as another "Kingpin" in a Civil Rights Conspiracy
16 with sufficient intent to in furtherance thereof by concert of action of two or more Joint
17 Principals Coconspirators cause Government-Insured Financial Enterprises to part with money
18 involving any rights or obligations that arise from the Constitution and/or other indissoluble
19 federal law links itself to (1) Joseph Eugene Piovo, (2) Civil Rights Act of 1866 14 Stat. 27
20 (1866) and (3) 42 U.S.C. Section 1982 to further the purpose to defraud Piovo of certain
21 Substantive Civil Rights.

22 Chicago Title acts as a Substantial part of the Civil Rights Conspiracy with sufficient
23 intent to further the purpose of the Interstate Conspiracy, Chicago Title participated together with

1 Civil Rights Conspiracy coconspirators CBSK, Colquitt, Guzman and others known and
2 unknown Civil Rights Conspiracy coconspirators conspire to deprive Plaintiff of his Civil
3 Rights. Chicago Title conspiracy resulted in theft of Plaintiff's APN in violation of Plaintiff's
4 Civil Rights. Chicago Title an Illinois corporation with its principal place of business located at
5 601 Riverside Ave. Jacksonville, FL 32204. Chicago Title Registered Agent is the CT
6 Corporation System, located at 208 So. LaSalle St. Suite 814, Chicago, IL 60604.

7 9. Civil Rights Conspiracy Defendant, Mortgage Electronic Registration System,
8 Inc. ("MERS") a Coconspirator, violated Plaintiff's Federal Civil Rights which grants Plaintiff a
9 claim for Federal jurisdiction. MERS acts as another "Kingpin" in a Civil Rights Conspiracy
10 with sufficient intent to in furtherance thereof by concert of action of two or more Joint
11 Principals Coconspirators cause Government-Insured Financial Enterprises to part with money
12 involving any rights or obligations that arise from the Constitution and/or other indissoluble
13 federal law links itself to (1) Joseph Eugene Piovo, (2) Civil Rights Act of 1866 14 Stat. 27
14 (1866) and (3) 42 U.S.C. Section 1982 to further the purpose to defraud Piovo of certain
15 Substantive Civil Rights. MERS is a national registry that tracks the ownership and servicing
16 rights of its members in residential mortgage loans. There are over 6,300 members of MERS.
17 MERS is a wholly-owned subsidiary and a alter ego of defendant MERSCORP, Inc. MERS also
18 is a Delaware corporation with its principal place of business located at 1818 Library Street,
19 Suite 300, Reston, Virginia 20190. For the purposes of this pleading, reference to MERS
20 includes reference to MERSCORP, Inc., MERS registered agent is the Corporation Trust
21 Company, 1209 Orange Street, Wilmington, Delaware 19801.

22 10. Civil Rights Conspiracy Defendant, MERSCORP HOLDINGS, INC., a/k/a
23 MERSCORP, Inc. ("MERSCORP") as an Alter Ego of MERS, MERSCORP, for the purposes of

1 this pleading, reference to MERSCORP includes reference to MERS, through its alter ego
 2 MERS violated Plaintiff's Federal Civil Rights which grants Plaintiff a claim for Federal
 3 jurisdiction, acted with sufficient intent in furtherance thereof by concert of action of two or
 4 more Joint Principals Coconspirators cause Government-Insured Financial Enterprises to part
 5 with money involving any rights or obligations that arise from the Constitution and/or other
 6 indissoluble federal law links itself to (1) Joseph Eugene Piovo, (2) Civil Rights Act of 1866 14
 7 Stat. 27 (1866) and (3) 42 U.S.C. Section 1982 to further the purpose to defraud Piovo of certain
 8 Substantive Civil Rights. MERSCORP acts in a Civil Rights Conspiracy with sufficient intent to
 9 further the purpose of Civil Rights Conspiracy MERSCORP participated together with other
 10 Civil Rights Conspiracy Coconspirators known and unknown to deprive Plaintiff of his Civil
 11 Rights. MERSCORP is a Delaware corporation with its principal place of business located in
 12 Vienna, Virginia. MERSCORP's registered agent is the Corporation Trust Company, 1209
 13 Orange Street, Wilmington, Delaware 19801.

14 11. Civil Rights Conspiracy Defendant, U.S. BANK NATIONAL ASSOCIATION,
 15 AS TRUSTEE, SUCCESSOR IN INTEREST TO BANK OF AMERICA, NATIONAL
 16 ASSOCIATION AS SUCCESSOR BY MERGER TO LASALLE BANK NATIONAL
 17 ASSOCIATION, AS TRUSTEE FOR CERTIFICATEHOLDERS OF BEAR STERNS ASSET
 18 BACKED SECURITIES I LLC, ASSET BACKED CERTIFICATES, SERIES 2006-HE8
 19 (hereinafter "U.S. Bank") acts as a "Kingpin" in a Civil Rights Conspiracy with sufficient intent
 20 to in furtherance thereof by concert of action of two or more Joint Principals Coconspirators
 21 cause Government-Insured Financial Enterprises to part with money involving any rights or
 22 obligations that arise from the Constitution and/or other federal law indissoluble links itself to
 23 (1) Joseph Eugene Piovo, (2) Civil Rights Act of 1866 14 Stat. 27 (1866) and (3) 42 U.S.C.

1 Section 1982. All such Civil Rights Conspiracy Coconspirators' related acts committed in the
2 past present and in the future by the Civil Rights Conspiracy membership, and/or to be
3 committed in the future by the past present and future membership all their related past present
4 and future federal acts shall be deemed to arise under Federal Law Civil Rights Act of 1866, 14
5 Stat. 27 (1866) and 42 U.S.C. Section 1982, Federal Jurisdiction ONLY. U.S. Bank together
6 with other Civil Rights Conspiracy Coconspirators conspired to deprive Plaintiff of his Civil
7 Rights conspiracy which resulted in theft of Plaintiff's APN in violation of Plaintiff's Civil
8 Rights.

9 U.S. Bank is served with a Notice of Pendency of Action describing its own violations
10 and the conspiracy by other Civil Rights Conspiracy coconspirators, Civil Rights Conspiracy
11 member and coconspirator U.S. Bank and their lawyers failed to formally withdraw and continue
12 to participate in the conspiracy and Plaintiff's Civil Rights violations with others known and
13 unknown Civil Rights Conspiracy coconspirators conspire to deprive Plaintiff of his Civil
14 Rights. U.S. Bank is a national banking association whose articles of association designate 425
15 Walnut Street, Cincinnati, OH 45202 as the location of its main office. U.S. Bank claims an
16 interest in the Plaintiff's property.

17 Whenever an act or omission of a corporation or business entity is alleged in this
18 Complaint, the allegation shall be deemed to mean and include an allegation that the corporation
19 or business entity acts or omits to act through its authorized officers, directors, agents, servants,
20 and/or employees, acting within the course and scope and or abuse of their duties, that the act or
21 omission is authorized by corporate managerial officers or directors, and that the act or omission
22 is ratified by the officers and directors of the corporation or business entity, where so reasonably
23 stated, implied and/or inferred.

1 Any allegation about acts of any corporate or other business Civil Rights Conspiracy
2 coconspirator means that the corporation or other business did the acts alleged through its
3 officers, directors, employees, agents and/or representatives while they are acting within the
4 actual or ostensible scope of or abuse of their authority where so reasonably stated, implied
5 and/or inferred.

6 At all relevant times, Civil Rights Conspiracy coconspirators commit the acts, cause or
7 direct others to commit the acts, or permit others to commit the acts alleged in this complaint. At
8 all relevant times, Civil Rights Conspiracy Coconspirators know or realize that they are
9 engaging in or planning to engage in the violations of the laws, the laws of the United States,
10 and Plaintiff's Civil Rights alleged in this Complaint.

11 Knowing or realizing that Civil Rights Conspiracy Coconspirators are engaging in or
12 planning to engage in unlawful Civil Rights conspiracy, Civil Rights Conspiracy Coconspirators
13 nevertheless engage in and/or facilitate the commission of those unlawful acts. Civil Rights
14 Conspiracy Coconspirators intend to and do engage in and/or encourage, facilitate, and/or assist
15 in the commission of the unlawful acts, and thereby commit and/or aid and abet others in the
16 unlawful Civil Rights conspiracy.

17 JURISDICTION AND VENUE

18 12. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331.
19 Federal district courts have original jurisdiction over "all civil actions arising under the
20 Constitution, laws or treaties of the United States." 28 U.S.C. § 1331; This Court has original
21 jurisdiction pursuant to Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982.

22 13. This Court has personal jurisdiction over Civil Rights Conspiracy Defendant(s)
23 and venue in this judicial district is proper pursuant to 28 U.S.C. § 1391(b), because a substantial

1 part of the events or omissions and Civil Rights Conspiracy violations give rise to the Plaintiffs'
 2 claims occur, committing a acts inside Nevada or outside of Nevada causing injury within
 3 Nevada.

4 PERTINENT FACTS AND LAW

5 14. The sequence of the Object of the Civil Rights Conspiracy as set out below in
 6 Plain English, inter alia, is...

7 15. On November 14, 2005 a Grant Bargain and Sale Deed is recorded wherein
 8 Robert Stone transfers the subject property for due consideration to VICE ROY UNITED
 9 NATIONS CREDIT AND COMMERCE INTERNATIONAL BLIND TRUST. The
 10 consideration for this transfer is paid and is shown on the Grant Bargain and Sale Deed. See
 11 **Exhibit A.**

12 The Object of the Conspiracy is to deprive Joseph Eugene Piovo of Civil Rights

13 16. On or about May 9, 2006 unbeknownst to Plaintiff and without Plaintiff's
 14 authorization, knowledge or consent the Civil Rights Conspiracy Coconspirators did knowingly
 15 and willfully join in an agreement to stop the free flow of Clark County Recorder's Piovo's Civil
 16 Rights Identification Document(s) and Information the quintessential element Identification
 17 Document(s) and Information thereof known as the APN, is what egregiously simultaneous to
 18 moment in time when the Civil Rights Conspiracy coconspirators herein did knowingly and
 19 willfully transfer the stolen Piovo's Civil Rights Identification Document(s) and Information
 20 APN did knowingly and willfully join in the agreement to in furtherance thereof transfer Title
 21 and Ownership of Piovo's Real Property by false identification document knowing that such
 22 document was produced by means of false and fraudulent pretenses, and representations without

1 lawful authority making the transfer void ab initio; the knowingly fraudulent Clark County
2 Recorder's Piovo's APN Civil Rights Identification Document(s) and Information APN theft did
3 inherently wrongfully stole from Piovo his quintessential element that stops his free flowing
4 Civil Rights, by the Civil Rights Conspiracy concert of action that unlawfully stops Piovo free
5 flow of Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 to Piovo, did
6 subject him to almost fatal heart attack in his then lawyer's office and having been told by the
7 doctors that Piovo *has only three hours to live* as a result of the transfer and ensuing legal battle
8 and threats of lawsuits as well as continuous cover up through over eight years of protracted
9 litigation, whereby, once removed stolen Identification Document(s) and Information, was in
10 direct violation of the Identity Theft and Assumption Deterrence Act, Identification Fraud, 18
11 U.S. Code Section 1028 (a) (2).

12 17. The relevancy of the evidence is conditioned upon fact, a sworn deposition:
13 Whereby within both the context and content thereof: the deposed Unscrupulous Officer of the
14 Court Attorney Ronald A. Colquitt willfully admits to and sets out in Plain English self
15 incriminating Civil Rights and 18 U.S.C. Section 1028 Violations, and he under oath without
16 ambiguities incriminates the Joint Principals Direct Endorsement Lenders, Chicago Title, Robert
17 Stone, himself, Ronald A. Colquitt, along with other Civil Rights Coconspirators by pointing out
18 his and their voluntary willful joining in of the Unlawful Civil Rights Conspiracy with an
19 inherently wrongful complete blatant disregards for the laws of the United States premeditated
20 decision in joining in the Callous Agreement did knowingly, and willfully combine, conspire,
21 and agree along with the Joint Principals Coconspirators to deprive Piovo of his free flowing
22 Civil Rights.

1 18. The instant Civil Rights Conspiracy was formed on or about May 09, 2006 by
2 Robert Stone who's address on May 09, 2006 is known to be 1416 Belmont Park Road,
3 Oceanside, CA 92057, in the following similar act evidence is relevant, whereby the relevancy
4 of the evidence is conditioned upon the existence of a fact Robert Stone - Case 2:09-cr-00216-
5 JCM-PAL-Document filed 06/04/09, Violation: 18 U.S.C. Section 371, whereby all Joint
6 Principals Coconspirators with a callous indifference to suffering / cold-blooded and indurate to
7 Civil Rights Conspiracy Laws and Laws of the United States, by concert of action the Civil
8 Rights Conspiracy severely and jointly all Joint Principals coconspirators did knowingly and
9 willfully combine, conspire, and agree to devise a Civil Rights Conspiracy scheme and artifice
10 to deprive Piovo by depriving him thereof his Civil Rights guarantees, by inter alia false and
11 fraudulent pretenses, and representations stopped Piovo free flow of Civil Rights Act of 1866 14
12 Stat. 27 (1866) and 42 U.S.C. Section 1982, in violations of Civil Rights Conspiracy laws of the
13 United States.

14 19. Ronald A. Colquitt, too, sets out in substance and in part, without ambiguities in
15 that all Joint Principals join in said Civil Rights Conspiracy Agreement in which all
16 Coconspirators knowingly and willfully and voluntarily join in the unlawful Civil Rights
17 Conspiracy Agreement to, by permitted inference, deprive Piovo's Civil Rights Identification
18 Document(s) and Information which to date places him in Civil Rights Violations Harm's way,
19 for eight years and counting, and then too the Civil Rights Conspiracy, by way of in harm's way
20 the stealing of Piovo's Civil Rights Identification Document(s) and Information, the then and
21 now once removed Identification Document(s) and Information APN, in direct violation of the
22 Identity Theft and Assumption Deterrence Act, Identification Fraud, 18 U.S. Code Section 1028
23 (a) (2) then and now the Joint Principals and Coconspirators simultaneous therewith did

1 knowingly and willfully by means of fraudulently false pretenses and false representation an
2 impersonation of Piovo the Rightful Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C.
3 Section 1982 and 42 U.S.C. Section 1982-Property Rights of Citizens Recipient, by means of the
4 stolen identification and deprived Civil Rights of Piovo did knowingly and willfully combine,
5 conspire, and agree with others known and unknown unbeknownst to Piovo, without his
6 authority did successfully transfer both the void ab initio Title and Ownership of now
7 fraudulently reassigned stolen Piovo's Civil Rights Identification Document(s) and Information
8 APN Real Property Ownership Identity, simultaneously directly deprives him of his Civil Rights
9 protection, which places him at a Substantive, Essential and Material Disadvantage by depriving
10 him of the Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982, and equal
11 protection under the laws of the United States, by means of false and fraudulent pretenses, and
12 representations which did unlawfully cause the transfer of Title and Ownership in violation of
13 laws of the United States, when stopped Piovo's Civil Rights to make and enforce contracts, to
14 sue, be parties, and give evidence, to inherit, purchase, lease, sell, hold, and convey real and
15 personal property, and to full and equal benefit of all laws and proceedings for the security of
16 person and property, as is enjoyed by white citizens.

17 20. Civil Rights coconspirators and defendants herein, Robert Stone, Officer of the
18 Court attorney Ronald Colquitt, CBSK, Chicago Title, together with other known and unknown
19 Civil Rights Conspiracy coconspirators, did knowingly and willfully conspire, to violate
20 Plaintiff's Federal Civil Rights and unlawfully transfer Plaintiff's property located at 1853
21 Indian Bend Drive first to Robert Stone and immediately thereafter transfer it to coconspirator
22 Guzman through but not limited to bank fraud, wire fraud, money laundering and mail fraud.
23 Recorded document states that coconspirator Ronald Colquitt is the trustee for Vice Roy United

1 Nations Credit and Commerce International Blind Trust. The deed is recorded in the Clark
2 County Recorder's Office on August 8, 2006, under the instrument number 20060803-0003774
3 and is incorporated herewith as **Exhibit G**.

4 **Coconspirator Robert Stone**

5 21. Robert Stone is directly involved in similar schemes for which he is convicted. On
6 June 4, 2009, United States Attorney for the District of Nevada filed Conspiracy charges against
7 Robert Stone, Case No. 2:09-CR-216-SCM. Stone is charged with 18 U.S.C. §371 knowingly and
8 willfully combine, conspire, and agree with others known and unknown Civil Rights Conspiracy
9 Coconspirators to commit Bank Fraud to defraud and obtain property under custody and control
10 of federally-insured financial institutions, by means of false and fraudulent pretenses,
11 representation and promises in violation of title 18, United States Code, Section 1344.

12 22. The Object of Government's Conspiracy charges against Stone included facts that
13 coconspirator Stone and others illegally obtained money and real property by fraudulently
14 obtaining mortgages through straw buyers to purchase houses in Nevada. See **Exhibit B**.

15 23. In the same fashion, in depravation of Piovo's Civil Rights Stone facilitated and
16 perpetrated the theft of Piovo's APN by unlawful purchase and sale of Piovo's Real property
17 through a straw buyer Tovar-Guzman and Civil Rights Conspiracy coconspirators Colquitt,
18 CBSK and Chicago Title.

19 24. On or about July 25, 2006, Robert Stone along with coconspirators Nevada State
20 Bar Licensed Attorney Ronald A. Colquitt; Michelle Wilson; Antonieta Tovar-Guzman; under
21 direction of "Kingpins" and Civil Rights Conspiracy Coconspirators Chicago Title and Direct
22 Endorsement Lenders CBSK voluntarily willfully and intelligently joined in The Civil Rights
23 Conspiracy coconspirator by fraudulent pretenses, and representations that caused the Clark

1 County Recorder's Office to part Plaintiff's Real Property Identification Number in violation of
2 both Civil Rights guarantee of equal protection under both the Civil Rights Act of 1866 14 Stat.
3 27 (1866) and inter alia 42 U.S.C. Section 1982 then and now by continued Civil Rights
4 Conspiracy of silence and cover up as a Civil Rights Conspiracy of Joint Principals
5 Coconspirators, that by means of false and fraudulent pretenses and representations does not
6 mention, discuss, or acknowledge the Civil Rights Conspiracy motivated by positive financial
7 interest in group solidarity about the Civil Rights deprivation of Plaintiff's aforementioned Civil
8 Rights, now the continued Civil Rights Conspiracy of silence within the courts is too a Civil
9 Rights Conspiracy coconspirators voluntary, knowing, willful, inherently wrongful devise,
10 scheme and artifice of Joint Principals' intentional Obstruction of Pivo's Due Process, in that
11 the federal government cannot intervene to protect Plaintiff from the Civil Rights infringement
12 due to Plaintiff's deprived Civil Rights and stolen Joseph Eugene Pivo's Civil Rights
13 Identification Document(s) and Information APN in violations of the Laws of the United States
14 and Civil Rights Act of 1866 14 STAT. 27 (1866) and 42 U.S.C. SECTION 1982, that did
15 actually deprive the Plaintiff of full and equal Civil Rights Benefits to inherit, purchase, lease,
16 sell, hold, and convey real property, whereas by concert of action said Civil Rights Conspiracy
17 coconspirators did unlawfully fraudulent transfer the stolen Pivo's Civil Rights Identification
18 Document(s) and Information inter alia in violation of Section 1028 Assumption Deterrence Act
19 Identification Document and Information.

20 25. Stone accepts Plaintiff's APN via recorded deed and immediately thereafter
21 transfers Plaintiff's APN to coconspirator Tovar-Guzman.

22 26. The actions by coconspirator Stone listed herewith but not limited to, in concert
23 with other Civil Rights Conspiracy coconspirators known and unknown constitute deliberate

1 violations of Plaintiff's Civil Rights, in doing so committed acts violating federal law deprive
 2 the Golden Age Senior Citizen Joseph Eugene Piovo of his United States Civil Rights Real
 3 Property Identification Number APN afforded to all other citizens of the United States, however
 4 deprives Plaintiff who has the same Civil Rights, in every State and Territory, as is enjoyed by
 5 white citizens, thereof coconspirators by concert of action did by means of related false and
 6 fraudulent Representation and Pretenses devise a Civil Rights Conspiracy scheme and artifice
 7 agreement to deprive the Golden Age Senior Citizen Joseph Eugene Piovo of inter alia his Civil
 8 Rights Identification Document(s) and Information, APN 178-17-811-009, as is Recorded with
 9 the Clark County Recorder's Office, Las Vegas, Nevada, and such Joseph Eugene Piovo's
 10 indissoluble Civil Rights Identification Documents and Information links Real Property asset to
 11 Joseph Eugene Piovo's Property Rights of Citizens that was/then/is currently under the custody
 12 and control of The Golden Age Senior Citizen Joseph Eugene Piovo, Joint Principals Civil
 13 Rights Conspiracy Coconspirators did fraudulently successfully transfer the Title and the
 14 Ownership and Joseph Eugene Piovo's Civil Rights Identification Document(s) and Information
 15 APN 178-17-811-009 of the Real Property, thus being the case then anything gained from the
 16 Civil Rights Conspiracy illegal concert of action, by voluntary and willful Civil Rights
 17 Conspiracy agreement is illegally garnered.

18 27. The deed transferring Plaintiff's property from Vice Roy to Stone is recorded in
 19 the Clark County Recorder's Office on August 3, 2006, under the instrument number 20060803-
 20 0003774 and is incorporated herewith as **Exhibit G**.

21 **Coconspirator and an Officer of the Court Ronald Colquitt**

22 28. On or about May 9, 2006, Nevada State Bar Licensed Attorney Ronald A.
 23 Colquitt Civil Rights Coconspirator voluntarily willfully and intelligently joined in the Joint

1 Principals Civil Rights Conspiracy Coconspirators stealing of Joseph Eugene Piovo's Civil
 2 Rights Identification Document(s) and Information APN the then and now once removed stolen
 3 Identification Document(s) and Information, in direct violation of the Identity Theft and
 4 Assumption Deterrence Act, Identification Fraud, 18 U.S. Code Section 1028 (a) (2) then and
 5 now the Joint Principals and Coconspirators simultaneous therewith did knowingly and willfully
 6 by means of fraudulently false pretenses and false representation an impersonation of Joseph
 7 Eugene Piovo the Rightful Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section
 8 1982, and 42 U.S.C. Section 1982-Property Rights of Citizens Recipient, by means of the stolen
 9 identification and deprived Civil Rights of Joseph Eugene Piovo did knowingly and willfully
 10 combine, conspire, and agree with others known and unknown unbeknownst to Joseph Eugene
 11 Piovo, without his authority did successfully transfer both the void ab initio Title and Ownership
 12 of the Related Joseph Eugene Piovo Assigned Once Removed, now fraudulently reassigned
 13 stolen Joseph Eugene Piovo's Civil Rights Identification Document(s) and Information, Real
 14 Property Ownership Identity, is the deprivation of his Property Rights of Citizens Civil Rights
 15 (by theft) of his Identification Document(s) and Information in direct violation of the Identity
 16 Theft and Assumption Deterrence Act, Identification Fraud, 18 U.S.C. Section 1028 (a) (2).

17 29. On August 28, 2007, Civil Rights coconspirator Colquitt testifies under oath in
 18 his own *self incriminating* sworn testimony and gives clear recollection of the events, Colquitt
 19 deposition is incorporated herewith as **Exhibit H**, Colquitt's personal participation his empirical
 20 knowledge and voluntary willful and intelligently made under oath declarations are transcribed
 21 by a State of Nevada Certified Court Reporter.

22 Ronald A. Colquitt Sworn Deposition, Page 17, lines 20 thru 23;

1 "I was put in position as trustee as noted by the lenders on that property. I
2 was the only one that could get that property back out so Mr. Stone could
3 refinance his house...;"

4
5 Ronald A. Colquitt Sworn Deposition, Page 33, lines 22 thru 25, Page 34
6 line 1 and 2;

7
8 "Q. Did you have anything to do with the lender? You said the lender or
9 mortgage company, you spoke to them?

10 A. They needed to get the property out of the trust that had been put in
11 there without my knowledge and because..."

12 Ronald A. Colquitt Sworn Deposition, Page 34, lines 3 thru 14

13
14 "Q. When you say "they" -

15 A. The title company that was handling the transaction, they needed to get
16 the property out of the trust that had been put in the trust. And the only
17 one that they would allow to do that was me because **I was the only**
18 **one on any of the documents listed as a trustee. And I explained to**
19 **her that I had resigned in November of the previous year. She said**
20 **she didn't care**, they needed the trust to place the property back to Mr.
21 Stone so that their deal could go forward. I did it got stiffed and closed
22 my file." [bold emphases added]

23
24 Ronald A. Colquitt Sworn Deposition, Page 35, lines 2 thru 14;

25
26 "Q. Did you talk to anybody at the title company?

27 A. **When I was approached to sign as trustee in May**, they had given
28 the gal at the title - I talked to a woman, I don't know her name, spoke
29 with somebody over there, and **that was when they explained to me**
30 **that I needed to sign as the trustee.** I said, but this trust doesn't exist.
31 It's dry. It's dead. This is a dead business deal.

32 Q. So you decided the best thing to do was to sign it?

33 A. I don't know that I decided the best thing to do was to sign it. **I signed**
34 **it."** [bold emphases added]

35
36
37 30. The deponent Ronald A. Colquitt voluntary, willful, knowing, intentional,
38 wrongful, and inherently wrongful omission of Chicago Title coconspirators identity, is a willful
39 omission with the intent to withhold vital and important by means of false and fraudulent
40 pretenses, and representations Obstructs Piovo's Due Process of Law vital information, and such

1 Due Process of Law Obstruction by the Joint Principals Led and Influenced conspiracy's code of
2 silence to conceal the identity of all Civil Rights Conspiracy Coconspirators, for the exception of
3 Robert J. Stone JR., wherein the code of silence reflect a Joint Principals Led and Influenced
4 Secrete Conspiracy, whereby the entire Joint Principals Led and Influenced Civil Rights
5 Conspiracy coconspirator is a protected unidentifiable group, all Coconspirators herein did
6 willfully, knowingly, voluntarily, intentionally, wrongfully, and inherently wrongfully combine,
7 conspire, and agree with others known and unknown to Joseph Eugene Piovo to commit
8 Obstruction of Piovo's Due Process, that is, to devise a Joint Principals Led and Influenced
9 scheme and artifice to steal and conceal by code of silence Joseph Eugene Piovo's, Civil Rights
10 Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil
11 Rights Identification Document(s) and Information APN, and subsequent to the Joint Principals
12 Led and Influenced Coconspirators herein did knowingly and willfully combine, conspire, and
13 agree with others known and unknown to Joseph Eugene Piovo to commit fraud, that is, to
14 devise a scheme and artifice to defraud and to obtain money under the custody and control of
15 federally-insured financial institutions, by means of false and fraudulent pretenses,
16 representations and promises that would cause federally-insured financial institutions to part with
17 money.

18 31. The Joint Principals Coconspirators deprivation of Joseph Eugene Piovo's
19 substantive Civil Rights Property Rights of Citizens Identification Document(s) and Information
20 in violation of 18 U.S.C. Section 1028, along with the Civil Rights Act of 1866 14 Stat. 27
21 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, automatically give the Federal
22 Courts Subject Matter Jurisdiction, too the selfsame Property Rights of Citizens attaches Federal
23 Courts Subject Matter Jurisdiction over all Civil Rights Conspiracy Coconspirators concert of

1 action in furtherance of any and all Civil Rights Conspiracy related Civil Rights incidences that
2 Joseph Eugene Piovo's equal protection under Civil Rights Laws affixed thereto by the Civil
3 Rights Property Rights of Citizens, whereby, All citizens of the United States shall have the
4 same right, in every State and Territory, as is enjoyed by white citizens thereof to inherit,
5 purchase, lease, sell, hold, and convey real and personal property.

6 42 U.S.C. Section 1982 Property Rights of Citizens,...

7 "All citizens of the United States shall have the same right, in every State and
8 Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell,
9 hold, and convey real and personal property."

10
11 32. Whereby he, Colquitt, the Officer of the Court, actually states in substance and in
12 part that he and other Civil Rights Conspiracy coconspirators "Kinpins" and facilitators,
13 themselves, along with other known and unknown Civil Rights Conspiracy coconspirators all
14 with a blatant disregard for the law: the Lenders and Title Company by concert of action did not
15 care if Colquitt is a Trustee or not, the named defendant Lenders and coconspirator Chicago
16 Title with a blatant disregard for the law influenced and corrupted Colquitt to affix his signature
17 to a falsified deed, and by concert of action transferred title and ownership of Plaintiff's real
18 property without authority of being Trustee of Vice Roy and with the assistance and direction of
19 coconspirator Chicago Title transferring the Plaintiff's property to coconspirator Stone in
20 violation of Plaintiff's Civil Rights..

21 33. In fact, Ronald Colquitt testifies under oath in a sworn deposition that he is not
22 the trustee of Vice Roy and had no authority to act as a trustee when he signed the document
23 transferring the property to Robert Stone but did it anyway.

24 34. Colquitt therefore did knowingly and willfully combine, conspire, and agrees
25 with others known and unknown Civil Rights Conspiracy coconspirators to act and deprive

1 Piovo of his Civil Rights in that the APN being the one and only Civil Rights Acts Identification
 2 Document(s) and Information, the Assessor's Parcel Number, known as Piovo's Civil Rights
 3 Identification Document(s) and Information beyond a reasonable doubt as the Civil Rights
 4 fiduciary duty as Property Rights of Citizens Identification Document(s) and Information, and
 5 Civil Rights Conspiracy Joint Principals Coconspirators 18 U.S.C. Section 1028 theft thereof,
 6 with the intent to in furtherance thereof by concert of action of two or more Joint Principal
 7 Coconspirators cause Government-Insured Financial Enterprises to part with money, the Joint
 8 Principals Coconspirators knowing and willful agreement to steal Piovo's Civil Rights
 9 Identification Document(s) and Information involving any rights or obligations that arise from
 10 the Constitution and/or other indissoluble federal law links itself to (1) Joseph Eugene Piovo, (2)
 11 Civil Rights Act of 1866 14 Stat. 27 (1866) and (3) 42 U.S.C. Section 1982 Property Rights of
 12 Citizens, thus being the case as the case is all Joint Principals Coconspirators Civil Rights
 13 Conspiracy by concert of action the Joint Principals Coconspirators herein, did knowingly and
 14 willfully combine, conspire, and agree with others known and unknown to Joseph Eugene Piovo,
 15 deprive him, Joseph Eugene Piovo the proper Citizen, of his Civil Rights Act of 1866 14 Stat. 27
 16 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens.

17 35. Whereas Colquitt as an Officer of the Court admits, in this, his sworn deposition
 18 that he did it, as a matter of fact, voluntarily willfully intelligently and intentionally joined in
 19 their inherently wrongful agreement with the actual corrupt Lender - CBSK and corrupt title
 20 company - Chicago Title along with others known and unknown Civil Rights Conspiracy
 21 coconspirators with sufficient intent to further the purpose of the Interstate Conspiracy.

22 36. Whereas, coconspirator Colquitt being an Officer of the Court while being
 23 influenced and corrupted by the Lenders and the Title Company actually voluntarily intelligently

1 willfully intentionally with full knowledge wrongfully and inherently wrongfully knew that the
2 best thing to do is not to sign the falsified fabricated *void ab initio* document as Trustee, he, an
3 Officer of the Court signed it with a complete blatant disregards for the law and in deprivation of
4 Pivo's Civil Rights.

5 37. Whereas, coconspirator Colquitt affixed his intentional inherently wrongful
6 signature, the intended Actus Reus; the intended guilty act, the intended wrongful and inherently
7 wrongful deed which renders the actor(s) liable combined with the *mens rea* the blatant disregard
8 for the law.

9 38. Whereas, coconspirator Colquitt breaches the Model Rules of Ethics, and/or
10 Ethical Rules and is part and partial by his own direct *self incriminating* sworn evidence of not
11 giving a formal withdrawal from the Civil Rights Conspiracy by acting in the commission of the
12 Civil Rights Conspiracy, voluntarily, knowingly, intentionally, wrongfully and inherently
13 wrongfully commits inter alia by illegal act, that is, to devise a Joint Principals Led and
14 Influenced scheme and artifice to steal and conceal by code of silence Joseph Eugene Pivo's,
15 Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of
16 Citizens, Civil Rights Identification Document(s) and Information APN, and subsequent to the
17 Joint Principals Led and Influenced Coconspirators herein did knowingly and willfully combine,
18 conspire, and agree with others known and unknown to Joseph Eugene Pivo to commit fraud,
19 that is, to devise a scheme and artifice to defraud and to obtain money under the custody and
20 control of federally-insured financial institutions, by means of false and fraudulent pretenses,
21 representations and promises that would cause federally-insured financial institutions to part with
22 money in Violation of Plaintiff's Federal Civil Rights.

23 **Coconspirator Michelle Wilson**

1 39. Coconspirator Michelle Wilson did knowingly and willfully combine, conspire,
2 and agree with others known and unknown Civil Rights Conspiracy coconspirators did
3 unlawfully act as Stone's "AGENT" to transfer the subject property at 1853 Indian Bend Drive
4 to coconspirator Stone. Wilson has signed under penalty of perjury and caused to be filed in the
5 public record in the Clark County Recorder's Office a form styled "Declaration of Value"
6 wherein Stone is listed as a Buyer (Grantee) and Wilson claimed to act in the Capacity of
7 Grantee's Agent. Wilson acknowledged under penalty of perjury on the said "Declaration of
8 Value" that "the information provided is correct..." and that ownership interest being transferred
9 to coconspirator Stone amounts to 100%.

10 40. Whereas, coconspirator Wilson to further the purpose of the Conspiracy, acts by
11 concert of action joined in the Civil Rights Conspiracy of the Lenders, Chicago Title Company,
12 Colquitt, Stone, Guzman and other known and unknown Civil Rights Conspiracy coconspirators
13 with sufficient intent to further the purpose of voluntarily willfully and intelligently stealing of
14 Joseph Eugene Piovo's Civil Rights Identification Document(s) and Information APN the then
15 and now once removed stolen Identification Document(s) and Information, in direct violation of
16 the Identity Theft and Assumption Deterrence Act, Identification Fraud, 18 U.S. Code Section
17 1028 (a) (2) then and now the Joint Principals and Coconspirators simultaneous therewith did
18 knowingly and willfully by means of fraudulently false pretenses and false representation
19 deprives Piovo of the Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982
20 and 42 U.S.C. Section 1982-Property Rights of Citizens Recipient, by means of the stolen
21 identification and deprives Civil Rights of Joseph Eugene Piovo did knowingly and willfully
22 combine, conspire, and agree with others known and unknown unbeknownst to Piovo, without
23 his authority did participate in successful transfer both the void ab initio Title and Ownership of

1 the Related Piovo Assigned Once Removed, now fraudulently reassigned stolen Piovo's Civil
2 Rights Identification Document(s) and Information, Real Property Ownership Identity APN.

3 41. Wilson's recorded Declaration of Value is incorporated herewith as **Exhibit I**.

4 **Coconspirator Tovar-Guzman**

5 42. Coconspirator Guzman admits her involvement in her own *self incriminating*
6 sworn testimony in a deposition dated August 2, 2007, taken by Steven J. Karen, Plaintiff's
7 counsel at the time. Guzman deposition is incorporated herewith as **Exhibit J**.

8 43. Whereas, coconspirator Antonieta Tovar-Guzman to further the purpose of the
9 Conspiracy, under direction of "Kingpins" and Civil Rights Conspiracy Coconspirators Chicago
10 Title and Direct Endorsement Lenders CBSK voluntarily willfully and intelligently joined in The
11 Civil Rights Conspiracy coconspirator by fraudulent pretenses, and representations that caused
12 the Clark County Recorder's Office to part Plaintiff's Real Property Identification Number in
13 violation of both Civil Rights guarantee of equal protection under both the Civil Rights Act of
14 1866 14 Stat. 27 (1866) and inter alia 42 U.S.C. Section 1982 then and now by continued Civil
15 Rights Conspiracy of silence and cover up as a Civil Rights Conspiracy of Joint Principals
16 Coconspirators, that by means of false and fraudulent pretenses and representations does not
17 mention, discuss, or acknowledge the Civil Rights Conspiracy motivated by positive financial
18 interest in group solidarity about the Civil Rights deprivation of Plaintiff's aforementioned Civil
19 Rights, now the continued Civil Rights Conspiracy of silence within the courts is too a Civil
20 Rights Conspiracy coconspirators voluntary, knowing, willful, inherently wrongful devise,
21 scheme and artifice of Joint Principals' intentional Obstruction of Piovo's Due Process, in that
22 the federal government cannot intervene to protect Plaintiff from the Civil Rights infringement
23 due to Plaintiff's deprived Civil Rights and stolen Joseph Eugene Piovo's Civil Rights

1 Identification Document(s) and Information in violations of the Laws of the United States and
2 Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982, that did actually deprive
3 the Plaintiff of full and equal Civil Rights Benefits to inherit, purchase, lease, sell, hold, and
4 convey real property, whereas by concert of action said Civil Rights Conspiracy coconspirators
5 did unlawfully fraudulent transfer the stolen Piovo's Civil Rights Identification Document(s) and
6 Information APN inter alia in violation of Section 1028 Assumption Deterrence Act
7 Identification Document(s) and Information.

8 44. Coconspirator Antonieta Tovar-Guzman to further the purpose of the Conspiracy,
9 under direction of "Kingpins" and Civil Rights Conspiracy Coconspirators Chicago Title and
10 Direct Endorsement Lenders CBSK voluntarily willfully and intelligently joined in The Civil
11 Rights Conspiracy to devise a Joint Principals Led and Influenced scheme and artifice to steal
12 and conceal by code of silence Joseph Eugene Piovo's, Civil Rights Act of 1866 14 Stat. 27
13 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights Identification
14 Document(s) and Information APN, and subsequent to the Joint Principals Led and Influenced
15 Coconspirators herein did knowingly and willfully combine, conspire, and agree with others
16 known and unknown to Joseph Eugene Piovo to commit fraud, that is, to devise a scheme and
17 artifice to defraud and to obtain money under the custody and control of federally-insured
18 financial institutions, by means of false and fraudulent pretenses, representations and promises
19 that would cause federally-insured financial institutions to part with money.

20 45. Guzman admits under oath that she agreed to act as a straw buyer and acquired
21 Plaintiff's property through bank fraud and in deprivation of Piovo's Civil Rights.

22 46. Coconspirator Guzman in her deposition admits that she is involved in, however
23 not limited to in violation of Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section

1 1982 Property Rights of Citizens, Civil Rights Identification Document(s) and Information APN
2 and fraudulent transfer of 1853 Indian Bend Drive, Henderson, Nevada 89074 and wherein
3 Guzman transfers the Title and Ownership of Plaintiff's property to herself and that she acts as a
4 straw buyer and received \$3,000.00 cash from one Franco Chavez for her involvement.

5 Guzman deposition Page 39, Line 6 through 23:

6 "Q. Did they promise anything out of this for you?

7 A. To me a week later, later, after I signed all the papers. they said to me
8 they were going to, like, thankful something.

9 Q. What do you mean thankful something? I

10 A. Well, that helped them.

11 Q. What were they going to give you?

12 A. Weil, eventually -- well, they were going to give me -- uh-huh. Yes.

13 They gave me \$3,000. 15

14 Q. Did they give you the \$3,000?

15 A. Not at that time. Later.

16 Q. At some point they gave you \$3,000?

17 A. Yes.

18 Q. When?

19 A. I do not remember.

20 Q. Was it in cash?

21 A. In cash."

22
23 Guzman deposition Page 40, line 20 through 25:

24 "Q. Okay. Let's talk about this \$3,000 for a moment. Who gave you the
25 \$3,000?

26 A. It was given by Franco Chavez, given to him by Aly.

27 Q. Franco Chavez handed you the money?

28 A. Yes, yes, through Aly, though."

29 Guzman deposition Page 72, line 10 through 19.

30 "Q. From what you described here, you got paid \$3,000, you signed a
31 bunch of papers without asking any questions involving the sale of a
32 house, right? Is that true?

33 A. If they received?

34 Q. I want you to first answer if what I've just said is true.

35 A. Uh-huh.

1 Q. Yes?

2 A. Yes.”

3
4 47. Coconspirator Guzman also admits that she never seen the property nor ever lived
5 at the property.

6 Guzman deposition Page 28, Line 22 through 24.

7 “Q. You've never seen 1853 Indian Bend.

8 A. Not from inside nor outside. I don't even know what area it's
9 located.”

10
11 48. As part of the crime of conspiracy and to further the purpose of the Conspiracy,
12 under direction of “Kingpins” and Civil Rights Conspiracy Coconspirators Chicago Title and
13 Direct Endorsement Lenders CBSK voluntarily willfully and intelligently joined in The Civil
14 Rights Conspiracy to devise a Joint Principals Led and Influenced scheme and artifice to steal
15 and conceal by code of silence Joseph Eugene Piovo's, Civil Rights Act of 1866 14 Stat. 27
16 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights Identification
17 Document(s) and Information APN, on or about July 24, 2006, Tovar-Guzman agreed to borrow
18 680,000 from CBSK, unlawfully secured by Plaintiff's property. Two instruments are signed by
19 Tovar-Guzman on this date; (1) Adjustable Rate Note [hereafter Note] between Tovar-Guzman
20 and CBSK. (2) Deed of Trust between Tovar-Guzman and CBSK.

21 49. Coconspirator Guzman voluntarily willfully intelligently and intentionally joined
22 in the Civil Rights Conspiracy's inherently wrongful agreement with the actual corrupt Lender -
23 CBSK and corrupt title company - Chicago Title along with others known and unknown Civil
24 Rights Conspiracy coconspirators with sufficient intent to further the purpose of the Interstate
25 Conspiracy.

26 50. Coconspirator Guzman admits in her sworn deposition that between the year 2004

1 and 2006 her income was around \$30,000.

2 Guzman deposition Page 24, Line 4 through Page 27 Line 19.

3 "Q. Do you recall approximately how much your gross income was for
4 2006 that you reported on your income taxes?

5 A. Let me try to think now. 2006, right? Let's see. Okay, I don't want
6 you to take just like that because, well, I do not remember exactly if
7 in that occasion, was the last time that I did taxes for Mary Kay. And
8 that is when I did something. But nothing else. From there on, if you
9 check, you'll see bad -- uh-huh.

10 Q. Listen carefully -

11 A. That is--

12 Q. Listen carefully to my question.

13 A. Okay.

14 Q. What was the amount, gross income that you filed as your income in
15 2006 tax return? Please give me your best estimate.

16 A. Okay, why are you asking me that?

17 Q. Once again, I'm here to ask the questions, you have to answer them.

18 A. I don't think it's logic for you to do it. It is what it is. Look-- I don't
19 know if it's correct that I can talk, but I need to -- if you're suing me
20 for one house that I purchased under a year recently, why are you
21 asking for 2006 now?

22 Q. Once again, I'm going to ask you to answer the question. We're
23 going to be here a lot longer if you start asking me questions. I
24 already told you, I'm not going to answer your questions.

25 A. Exactly, I'm not too sure.

26 Q. Give me your best estimate.

27 A. I don't know if I -- 30,000. I don't know. That was my best year at
28 Mary Kay.

29 Q. Let's go to the 2005 tax year. Give me your best estimate, what you
30 filed as your income on your tax return.

31 A. I do not remember. Truth is that, and I just cannot give you numbers.

32 Q. Was it more than 30,000?

33 A. No.

34 Q. Under 30,000?

35 A. I don't remember.

36 Q. You know it was not more than 30,000, though.

37 A. No.

38 Q. Are you all right?

39 A. Yes.

40 Q. Are you going to be okay or do you want to take a break?

1 A. No, let's continue, because I have to go back there.

2 Q. Ready?

3 A. Yes.

4 Q. 2004. I want your best estimate of the income reported of your taxes,
5 and let's start by asking, was it more than 30,000?

6 A. I do not remember.

7 Q. You don't know if it was more than 30,000?

8 A. I do not remember. That's the truth.

9 Q. You don't remember if it was less than 30,000?

10 A. If you wish, I can -- if you need copies, I can send you the copies of
11 every year that I've done.

12 Q. What's the most you ever made in a year?

13 A. The most that I made in one year is, like, 33,000. When I was at
14 Mary Kay.

15 Q. What year was that?

16 A. I don't remember.

17 Q. Were you married at the time?

18 A. Yes.

19 Q. Bow much was your husband's income?

20 A. My husband's work is like sales. Sometimes rains, the customers don't
21 want because it's going to rain. And they don't want -- they have their
22 cars dean. That's why we don't have something that you can say with
23 certainly (sic) how much money he makes.

24 Q. Does he have a car cleaning business as well?

25 A. Yes.

26 Q. And a carpet cleaning business?

27 A. Yes.

28 Q. What's the most that he's ever earned while you've been married for
29 the year?

30 A. I do not remember.

31 Q. More than 30,000?

32 A. No.

33 Q. Less than 30,000?

34 A. I just know that he has never made much. I was making more than
35 him in Mary Kay."

36
37 51. In fact by her own admission Guzman could never qualify for a \$680,000 loan.

38 52. For the purpose of this complaint prima facie evidence in the Clark County

39 Recorder's office makes it clear that coconspirator CBSK made a loan to Tovar-Guzman, by

1 CBSK recording a Deed of Trust given by Tovar-Guzman to CBSK. Coconspirator Guzman
 2 admits participation in the instant Civil Rights Conspiracy voluntarily and willfully agreed with
 3 other members of the Civil Rights Conspiracy to intelligently join in the unlawful agreement to
 4 voluntarily, willfully intentionally wrongfully, and inherently wrongfully to intelligently
 5 knowingly defraud Piovo and federally-insured financial institutions and did so by unlawfully
 6 transferring the Title and Ownership of Plaintiff's property to herself. Recorded Property Deed in
 7 Guzman's name is incorporated herewith as **Exhibit K**.

8 53. Coconspirator Guzman through her attorney coconspirator Brennan admits that on
 9 April 06, 2012, Guzman filed petition for bankruptcy protection wherein Plaintiff's property is
 10 listed as Guzman's asset. Guzman received full discharge *Infra jurisdictionem*...within the
 11 jurisdiction of federal bankruptcy protection on July 20, 2012. The filing and the discharge,
 12 which included her fraudulent ill gotten gain of Piovo's APN and the property, when included in
 13 the fraudulent bankruptcy filing necessarily involved the Federal Government and the Federal
 14 Government Bankruptcy Division. Bankruptcy Court requires that petitioner submits all
 15 statements to be true and under oath.

16 54. Whereas, coconspirator Guzman affixed her intentional inherently wrongful
 17 signature to the bankruptcy filing, the intended Actus Reus; the intended guilty act, the intended
 18 wrongful and inherently wrongful deed which renders the actor liable combined with the *mens*
 19 *rea* the blatant disregard for the law voluntarily, knowingly, intentionally, wrongfully and
 20 inherently wrongfully commits *inter alia* by illegal act, that is, continues to participate in a Joint
 21 Principals Led and Influenced scheme and artifice to conceal by code of silence from the
 22 bankruptcy court and Piovo the actual acts of Conspiracy in violation of bankruptcy rules and
 23 Piovo's Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights

1 of Citizens, Civil Rights Identification Document(s) and Information APN .

2 55. Plaintiff discovered the information about the Guzman's bankruptcy filing from a
 3 December 17, 2013 letter sent by Guzman's counsel Shauna Brennan. Plaintiff asks the court to
 4 take Judicial Notice of the fact that Plaintiff was not informed about the bankruptcy nor was
 5 Plaintiff listed as Guzman's creditor, in fact Plaintiff could never be listed as Guzman's creditor
 6 because Plaintiff never extended any form of credit to Guzman. Any attempt to suggest that
 7 Plaintiff is Guzman's creditor is hereby denied in its entirety, such attempt would only suggest
 8 that Plaintiff was somehow involved in the conspiracy to steal his own property.

9 56. Furthermore, pursuant to 11 U.S. Code § 523(a)(2)(A), Guzman bankruptcy
 10 discharge is not valid.

11 11 U.S. Code § 523 (a)(2)(A)- Exceptions to discharge

12 (a) A discharge under section 727, 1141, 1228 (a), 1228 (b), or 1328 (b) of
 13 this title does not discharge an individual debtor from any debt—

14 (2) for money, property, services, or an extension, renewal, or refinancing
 15 of credit, to the extent obtained by—

16 (A) false pretenses, a false representation, or actual fraud, other than a
 17 statement respecting the debtor's or an insider's financial condition;
 18

19 AND

20 Pursuant to 11 U.S. Code § 727(a)(4)(A) and (B) - Discharge

21 (a) The court shall grant the debtor a discharge, unless-

22 (4) the debtor knowingly and fraudulently, in or in connection with the
 23 case-

24 (A) made a false oath or account;

25 (B) presented or used a false claim;
 26

27 57. Coconspirator Guzman continues her Civil Rights Conspiracy activity and made
 28 false declaration in existent bankruptcy proceeding by claiming Plaintiff's property as her own

1 asset in furtherance to illegally acquire and retain illegal ownership of Plaintiff's property; this
2 related federal act committed in the past present and in the future by the Civil Rights Conspiracy
3 member Guzman, with a complete disregard for the Civil Rights Conspiracy Laws of the United
4 States and in violation of Piovo's Civil Rights and Specifically Civil Rights Act of 1866 14 Stat.
5 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights Identification
6 Document(s) and Information APN.

7 58. The unlawful actions by coconspirator Guzman listed herewith but not limited to,
8 in concert with other Civil Rights Conspiracy coconspirators known and unknown constitute
9 deliberate violations of Plaintiff's Civil Rights, Civil Rights Act of 1866 14 Stat. 27 (1866) and
10 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights Identification Document(s) and
11 Information APN, voluntarily, knowingly, intentionally, wrongfully and inherently wrongfully
12 commits *inter alia* by illegal act, that is, to participate in a Joint Principals Led and Influenced
13 scheme and artifice to steal and conceal by code of silence Piovo's, Civil Rights Act of 1866 14
14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights
15 Identification Document(s) and Information APN, and subsequent to the Joint Principals Led and
16 Influenced Coconspirators herein did knowingly and willfully combine, conspire, and agree with
17 others known and unknown to Piovo to commit fraud, that is, to participate in a scheme and
18 artifice to defraud and to obtain money under the custody and control of federally-insured
19 financial institutions, by means of false and fraudulent pretenses, representations and promises
20 that would cause federally-insured financial institutions to part with money in Violation of
21 Piovo's Federal Civil Rights in doing so commits acts violating federal law when Guzman
22 illegally and unlawfully transfers title, and transfers ownership of Piovo's Identification
23 Document(s) and Information of Piovo's APN to herself.

1 **Coconspirator and an Officer of the Court Shauna Brennan**

2 59. Coconspirator Brennan aids and abets coconspirator Guzman to further the
 3 purpose of the Interstate Conspiracy and Civil Rights Conspiracy's related federal acts deliberate
 4 violations of Plaintiff's Civil Rights, Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C.
 5 Section 1982 Property Rights of Citizens, Civil Rights Identification Document(s) and
 6 Information APN, voluntarily, knowingly, intentionally, wrongfully and inherently wrongfully
 7 commits *inter alia* by illegal act, that is, to participate in a Joint Principals Led and Influenced
 8 scheme and artifice to steal and conceal by code of silence Piovo's, Civil Rights Act of 1866 14
 9 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights
 10 Identification Document(s) and Information APN, commits in the past present and in the future
 11 by the membership, the Civil Rights Conspiracy's acts

12 60. On or about December 17, 2013, coconspirator Brennan sent an extortionist
 13 threatening and intentionally misleading letter, incorporated herewith as **Exhibit L**, to Piovo,
 14 said letter states in pertinent part the following:

15 "Please be advised that Ms. Tovar-Guzman filed for Chapter 7 bankruptcy
 16 protection on April 6, 2012, and received a full discharge on July 20, 2012. I
 17 have verified that the property located at 1853 Indian Bend Drive
 18 Henderson, Nevada ("Property") was included in this bankruptcy filing.
 19 Consequently any causes of action concerning Antonieta Tovar-Guzman's
 20 interest in and to this Property has been discharged under the Bankruptcy
 21 and any attempt to collect against her is a violation of Federal Bankruptcy
 22 protection. **Therefore demand is made that you immediately dismiss**
 23 **Antonieta Tovar-Guzman from the above-referenced lawsuit.**" [Bold
 24 emphases added]
 25

26 61. Brennan, an Officer of the Court, a lawyer is tampering with evidence contained
 27 within Guzman's sworn testimony when Guzman and as her attorney Brennan threatens Joseph
 28 Eugene Piovo with a counter lawsuit, which instilled additional fear of a countersuit: In

1 substance and in part Guzman's lawyer's extortionist threat is: Therefore demand is made that
2 you immediately dismiss Antonieta Tovar-Guzman from the above-referenced lawsuit, (that
3 infers...and if you don't I'm going to sue you) which instilled additional fear of a further loss of
4 monies to Joseph Piovo by a countersuit. If Joseph Eugene Piovo does not withdraw his lawsuit
5 whereby Guzman's perjured testimony, her sworn deposition, does not result in liability to
6 Guzman, she will consider offering whatever assistance she can, provided that it is not contrary
7 to the current Bankruptcy discharge and does not result in liability to her.

8 62. Brennan's threat is to have Joseph Eugene Piovo let Guzman, her client, off the
9 hook; or Shauna Brennan, a third party, blows up the case; and Joseph Eugene Piovo is wrongly
10 deprives adequate relief due when third party Respondent interference deprives Piovo of due
11 process to legal remedies, when she voluntarily, knowingly, intentionally, willfully, wrongfully
12 and inherently wrongfully makes an unlawful agreement to become a self incriminating victim of
13 fraudulent pleadings, in order to clear title to the property and to that end Shauna Brennan -
14 Guzman's lawyer and Guzman will consider offering whatever assistance they can, provided that
15 Piovo's legal action is not contrary to Guzman's current Bankruptcy discharge, and does not
16 result in liability to her.

17 63. The third paragraph of the letter is clearly an attempt cover up the conspiracy and
18 an offer to cover up coconspirator Guzman's acts as well as admission of such acts.

19 "It appears that you are attempting to clear title to the Property and to that
20 end my client will consider offering whatever assistance she can, provided
21 that it is not contrary to the current Bankruptcy discharge and does not result
22 in liability to her. I am prepared to draft a Stipulation and Release of any
23 interest in the property, which should satisfy your objectives. Please contact
24 my office to discuss options."
25

26 Brennan, by Guzman's Deposition, knows of Guzman's Sworn Testimony whereby

1 Brennan admits that Guzman testified under oath that she is a straw buyer through Franco
2 Chaves for her to buy a house for Ali. Brennan knows or should know about Stone's arrest and
3 all known and unknown coconspirator's concert of action in Guzman's purchase of the house
4 and deprivation of Piovo's Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section
5 1982 Property Rights of Citizens, Civil Rights Identification Document(s) and Information APN.

6 64. Brennan's voluntary, willful, knowing, intentional, wrongful, and inherently
7 wrongful omission of Guzman's acts and violations of Piovo's Civil Rights is a willful omission
8 with the intent to withhold vital and important information from the Bankruptcy court and the
9 instant Federal court by means of false and fraudulent pretenses, and extortionist
10 misrepresentations to Piovo Obstructs Piovo's Due Process of Law and conspiracy's code of
11 silence continue to conceal deprivation and violations by code of silence Piovo's, Civil Rights
12 Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil
13 Rights Identification Document(s) and Information APN, and subsequent to the Joint Principals
14 Led and Influenced Coconspiracy.

15 65. Brennan, a lawyer and a bankruptcy lawyer at that, with full knowledge of 11
16 U.S.C. § 523 (a)(2)(A) and 11 U.S.C. § 727(a)(4)(A) and (B) voluntary, willful, knowing,
17 intentional, wrongful, and inherently wrongful participation in Piovo's Civil Rights deprivation
18 is a willful omission with the intent to withhold vital and important information from the
19 Bankruptcy court and the instant Federal court by means of false and fraudulent pretenses, and
20 extortionist misrepresentations and continuous cover up and Obstruction Piovo's Due Process of
21 Law and conspiracy's code of silence continue to conceal deprivation and violations by code of
22 silence Piovo's, Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982
23 Property Rights of Citizens, Civil Rights Identification Document(s) and Information APN and

1 in order to continue such deprivation, cover up and violation of Piovo Civil Rights Brennan files
 2 without Piovo's consent or knowledge the Release of Guzman's Purported Interest in Piovo's
 3 property in the records of Clark County Recorder's Office denying Piovo the due process to legal
 4 remedies. The release is incorporated herewith as **Exhibit M**.

5 **Coconspirator CBSK**

6 66. On or about July 24, 2006, coconspirator CBSK - Direct Endorsement Lender,
 7 did knowingly, voluntarily, intelligently, willfully, combine, conspire, and agree with others
 8 known and unknown Civil Rights Conspiracy coconspirators and did unlawfully act by
 9 approving the loan to coconspirator Guzman, disregarding Federal and CBSK own underwriting
 10 requirements.

11 67. Whereas, coconspirator CBSK to further the purpose of the Conspiracy, known
 12 "Kingpin" and Civil Rights Conspiracy Coconspirator and Direct Endorsement Lender CBSK
 13 voluntarily willfully and intelligently joined in The Civil Rights Conspiracy coconspirator by
 14 fraudulent pretenses, and representations that caused the Clark County Recorder's Office to part
 15 Plaintiff's Real Property Identification Number APN in violation of both Civil Rights guarantee
 16 of equal protection under both the Civil Rights Act of 1866 14 Stat. 27 (1866) and inter alia 42
 17 U.S.C. Section 1982 then and now by continued Civil Rights Conspiracy of silence and cover up
 18 as a Civil Rights Conspiracy of Joint Principals Coconspirators, that by means of false and
 19 fraudulent pretenses and representations does not mention, discuss, or acknowledge the Civil
 20 Rights Conspiracy motivated by positive financial interest in group solidarity about the Civil
 21 Rights deprivation of Plaintiff's aforementioned Civil Rights, now the continued Civil Rights
 22 Conspiracy of silence is too a Civil Rights Conspiracy coconspirators voluntary, knowing,
 23 willful, inherently wrongful devise, scheme and artifice deprivation of Civil Rights and stolen

1 Joseph Eugene Piovo's Civil Rights Identification Document(s) and Information APN in
2 violations of the Laws of the United States and Civil Rights Act of 1866 14 Stat. 27 (1866) and
3 42 U.S.C. Section 1982, that did actually deprive the Piovo of full and equal Civil Rights
4 Benefits to inherit, purchase, lease, sell, hold, and convey real property, whereas by concert of
5 action said Civil Rights Conspiracy coconspirators did unlawfully fraudulent transfer the stolen
6 Piovo's Civil Rights Identification Document(s) and Information APN inter alia in violation of
7 Section 1028 Assumption Deterrence Act Identification Document and Information.

8 68. Pursuant to Colquitt's sworn testimony CBSK and Chicago Title prior to
9 Guzman's closing of the loan contact coconspirator Colquitt to influence his actions to join the
10 Civil Rights Conspiracy.

11 69. CBSK directed another coconspirator Chicago Title to perform the closing of
12 Guzman's loan. CBSK repeatedly violated Federal self-reporting requirements and kept
13 coconspirator Guzman's loan a secret.

14 70. CBSK is responsible for all aspects of mortgage application, the property
15 analysis, and the underwriting of the loan. CBSK is responsible for employment of underwriters
16 to evaluate Guzman's credit characteristics, the adequacy and stability of Guzman's income to
17 meet the periodic payments under the mortgage and all other obligations, and the adequacy of
18 Guzman's available assets to close the transaction, and render the underwriting decision in
19 accordance with applicable regulations, policies and procedures. In addition, CBSK had to
20 ensure that its underwriters "had appraised the property in accordance with the underwriting
21 standards and requirements".

22 71. An attempt was made by unknown coconspirators to enter Piovo's property for
23 the purpose of conducting real estate appraisal. Plaintiff refused to allow said appraisal to take

1 place since plaintiff never requested one to be done, and asked two unknown coconspirators to
2 leave the property.

3 72. In her deposition coconspirator Guzman admits that she only made at most
4 between 30,000 and 33,000 dollars a year upon issuance of the loan clearly indicative pursuant to
5 Federal guidelines such salary would not qualify Guzman for a loan in the amount of \$680,000.

6 73. On October 9, 2007, Pursuant to Section 50319 of California Financial Code,
7 Preston Dufauchard, California Corporations Commissioner issued an Order to CBSK to
8 Discontinue Residential Mortgage Lending and/or Servicing Activities. The order is incorporated
9 herewith as **Exhibit D**. And on November 5, 2007, California Corporations Commissioner
10 issued an Order Summarily revoking CBSK lending/servicing license. The order is incorporated
11 herewith as **Exhibit E**. In addition Nevada Secretary of State permanently revoked this
12 coconspirator as well. CBSK claims an interest in the Plaintiff's property through a recorded
13 Deed of Trust given to CBSK by coconspirator Guzman. The recorded Deed of Trust is
14 incorporated herewith as **Exhibit F**.

15 74. Coconspirator CBSK and the instant Civil Rights Conspiracy voluntarily and
16 willfully agree with one another to intelligently join in the unlawful agreement to willfully,
17 knowingly, voluntarily, intentionally, wrongfully, and inherently wrongfully combine, conspire,
18 and agree with others known and unknown to Piovo to act as one of the Joint Principals' Led and
19 Influenced scheme and artifice to steal, conceal and deprive Piovo's, Civil Rights Act of 1866 14
20 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights
21 Identification Document(s) and Information APN, and subsequent to the Joint Principals Led and
22 Influenced Coconspirators herein did knowingly and willfully combine, conspire, and agree with
23 others known and unknown to Piovo to commit fraud, that is, to devise a scheme and artifice to

1 defraud and to obtain money under the custody and control of federally-insured financial
2 institutions, by means of false and fraudulent pretenses, representations and promises that would
3 cause federally-insured financial institutions to part with money.

4 75. The unlawful actions by coconspirator CBSK listed herewith but not limited to, in
5 concert with other Civil Rights Conspiracy coconspirators known and unknown constitute
6 deliberate violations of Plaintiff's Civil Rights, Civil Right to Life, in doing so commits acts
7 violating federal law when illegally and unlawfully participated in the transfer of title and
8 transfer of ownership of Piovo's real property to Coconspirator Guzman.

9 **Coconspirator Chicago Title**

10 76. On or about July 24, 2006, Civil Rights Coconspirator Chicago Title, did
11 knowingly, voluntarily, intelligently, willfully, combine, conspire, and agree with others known
12 and unknown Civil Rights Conspiracy Coconspirators and did voluntarily, willfully, knowingly,
13 intentionally, wrongfully and inherently wrongfully with the requisite intent, to by concert of
14 action, did successfully commit the Civil Rights Conspiracy violation that did **firstly with**
15 **callous** disregard Piovo's Civil Rights together in concert of action with Civil Rights Conspiracy
16 Coconspirator Ronald Colquitt to disregard Federal stole Piovo's Civil Rights Identification
17 Document(s) and Information APN, the then and now once removed stolen Identification
18 Document and Information, was done in direct violation of the Identity Theft and Assumption
19 Deterrence Act, Identification Fraud, 18, U.S. Code Section 1028 (a) (2) then and now the Joint
20 Principals and Coconspirators simultaneous therewith did knowingly and willfully by means of
21 fraudulently false pretenses and false representation impersonate Joseph Eugene Piovo the
22 Rightful Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 and 42, U.S.C.
23 Section 1982-Property Rights of Citizens Recipient, by means of the stolen identification and

1 deprived Piovo's Civil Rights and did knowingly and willfully combine, conspire, and agree
2 with others known and unknown unbeknownst to Piovo, without his authority did successfully
3 transfer both the void ab initio Title and Ownership of the Related Joseph Eugene Piovo
4 Assigned Once Removed, now fraudulently reassigned stolen Joseph Eugene Piovo's Civil
5 Rights Identification Document(s) and Information APN, Real Property Ownership Identity, the
6 then and now once removed stolen Identification Document(s) and Information APN, in direct
7 violation of the Identity Theft and Assumption Deterrence Act, Identification Fraud, 18, U.S.
8 Code Section 1028 (a) (2) then and now the Joint Principals and Coconspirators simultaneous
9 therewith did knowingly and willfully by means of fraudulently false pretenses and false
10 representation an impersonation of Joseph Eugene Piovo the Rightful Civil Rights Act of 1866
11 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 and 42 U.S.C. Section 1982-Property Rights of
12 Citizens Recipient, by means of the stolen identification and deprived Civil Rights of Joseph
13 Eugene Piovo did knowingly and willfully combine, conspire, and agree with others known and
14 unknown unbeknownst to Joseph Eugene Piovo, without his authority did successfully transfer
15 both the void ab initio Title and Ownership of the Related Joseph Eugene Piovo Assigned Once
16 Removed, now fraudulently reassigned stolen Joseph Eugene Piovo's Civil Rights Identification
17 Document(s) and Information, Real Property Ownership Identity, and subsequent to, did
18 egregiously stop the free flow of his Civil Rights Act of 1866 14 STAT. 27 (1866) and 42 U.S.C.
19 SECTION 1982 Civil Rights Guarantees, with the knowing, willful, wrongful intent to in
20 substance and in part, inter alia, did commit the essential substantive and material quintessential
21 element and Primary Necessary Objective of the Civil Rights Conspiracy, did deprive Piovo by
22 transfer of his Identification Document(s) and Information APN, by means of false and
23 fraudulent pretenses, and representations did cause the Clark County Recorder's Office to

1 reassign the void ab initio Pivo's previously Lawfully Assigned Civil Rights Identification
2 Document(s) and Information APN.

3 Ronald A. Colquitt Sworn Deposition, Page 34, lines 3 thru 14

4
5 "Q. When you say "they" -

6 A. The title company that was handling the transaction, they needed to get
7 the property out of the trust that had been put in the trust. And the only
8 one that they would allow to do that was me because **I was the only**
9 **one on any of the documents listed as a trustee. And I explained to**
10 **her that I had resigned in November of the previous year. She said**
11 **she didn't care**, they needed the trust to place the property back to Mr.
12 Stone so that their deal could go forward. I did it got stiffed and closed
13 my file." [bold emphases added]

14 Ronald A. Colquitt Sworn Deposition, Page 35, lines 2 thru 14;

15
16 "Q. Did you talk to anybody at the title company?

17 A. **When I was approached to sign as trustee in May, they had given**
18 **the gal at the title** - I talked to a woman, I don't know her name,
19 spoke with somebody over there, and **that was when they explained**
20 **to me that I needed to sign as the trustee.** I said, but this trust doesn't
21 exist. It's dry. It's dead. This is a dead business deal.

22 Q. So you decided the best thing to do was to sign it?

23 A. I don't know that I decided the best thing to do was to sign it. **I signed**
24 **it."** [bold emphases added]

25
26 77. Coconspirator Chicago Title and the instant Civil Rights Conspiracy voluntarily
27 and willfully agree with one another to intelligently join in the unlawful agreement to willfully,
28 knowingly, voluntarily, intentionally, wrongfully, and inherently wrongfully combine, conspire,
29 and agree with others known and unknown to Pivo to act as one of the Joint Principals' Led and
30 Influenced scheme and artifice to steal, conceal and deprive Pivo's, Civil Rights Act of 1866 14
31 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights
32 Identification Document(s) and Information APN, and subsequent to the Joint Principals Led and
33 Influenced Coconspirators herein did knowingly and willfully combine, conspire, and agree with
34 others known and unknown to Pivo to commit fraud, that is, to devise a scheme and artifice to

1 defraud and to obtain money under the custody and control of federally-insured financial
2 institutions, by means of false and fraudulent pretenses, representations and promises that would
3 cause federally-insured financial institutions to part with money.

4 78. The unlawful actions by coconspirator Chicago Title listed herewith but not
5 limited to, in concert with other Civil Rights Conspiracy Coconspirators known and unknown
6 constitute deliberate violations of Plaintiff's Civil Rights, Civil Right to Life, and in doing so
7 commits acts violating federal law when illegally and unlawfully participated in the transfer of
8 title and transfer of ownership of Piovo's real property to Coconspirator Guzman constitute
9 deliberate violations of Piovo's Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C.
10 Section 1982 - Property Rights of Citizens are indissoluble Civil Rights Equal Protection under
11 the law fraud.

12 **Coconspirators MERS and MERSCORP**

13 For the purposes of this pleading, reference to MERS includes reference to MERSCORP
14 MERS's alter ego.

15 79. Coconspirator MERS joined in the Civil Rights conspiracy did knowingly,
16 voluntarily, intelligently, willfully, combine, conspire, and agree with others known and
17 unknown Civil Rights Conspiracy coconspirators to act as one of the Joint Principals Led and
18 Influenced scheme and artifice to steal, conceal and deprive Piovo's, Civil Rights Act of 1866 14
19 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights
20 Identification Document(s) and Information APN, and subsequent to the Joint Principals Led and
21 Influenced Coconspirators herein did knowingly and willfully combine, conspire, and agree with
22 others known and unknown to Piovo to commit fraud, that is, to devise a scheme and artifice to
23 defraud and to obtain money under the custody and control of federally-insured financial

1 institutions, by means of false and fraudulent pretenses, representations and promises that would
2 cause federally-insured financial institutions to part with money.

3 80. MERS is at all times cognizant of the Civil Rights violations by other
4 coconspirators through a lawsuit filed by Plaintiff in Nevada state court, receiving copies of the
5 Colquitt and Guzman's depositions and their admission to the Civil Rights violations depriving
6 Plaintiff of his Civil Rights as well as Plaintiff's Notice of the Notice of Pendency of Action
7 describing its own violations and the conspiracy by other Civil Rights Conspiracy
8 coconspirators, Civil Rights Conspiracy member and coconspirator MERS and their lawyers
9 failed to withdraw and instead continue to engage Piovo in the fight for his Life and continue to
10 participate in the conspiracy and violations of Plaintiff's Civil Rights with others known and
11 unknown Civil Rights Conspiracy coconspirators and others known and unknown Civil Rights
12 Conspiracy coconspirators conspire to deprive Piovo of his Civil.

13 81. Civil Rights Coconspirators' MERS lawyers by concert of action joined in the
14 Civil Rights Conspiracy of the Lenders, Chicago Title Company, Colquitt, Stone, Guzman and
15 other known and unknown Civil Rights Conspiracy coconspirators by scheme and artifice to
16 steal, conceal and deprive Piovo's, Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C.
17 Section 1982 Property Rights of Citizens, Civil Rights Identification Document(s) and
18 Information APN.

19 82. On March 20, 2007, People's Choice Home Loan, Inc. files voluntary Bankruptcy
20 Petition in the United States Bankruptcy Court, Central District of California, Case No.:
21 8:07-bk-10767-RK. The filing is incorporated herewith as **Exhibit N**.

22 83. On May 2, 2007, Wendy V. Perry acting as Assistant Secretary of MERS
23 executes substitution of trustee dated the same date May 2, 2007, MERS did knowingly,

1 voluntarily, intelligently, willfully, combine, conspire, and agree with others known and
2 unknown Civil Rights Conspiracy coconspirators participate as one of the Joint Principals Led
3 and Influenced scheme and artifice to steal, conceal and deprive Piovo's, Civil Rights Act of
4 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights
5 Identification Document(s) and Information APN, executes said substitution of trustee in San
6 Diego, California and records it in Las Vegas Nevada Clarks County Recorder's office, where
7 Fidelity National Default Solutions acting on behalf of MERS where it states that MERS
8 allegedly is the original Beneficiary under the Guzman Deed of Trust terminated the
9 appointment of the original trustee, Civil Rights Coconspirator Chicago Title, and appointed a
10 substitute trustee CAL-WESTERN RECONVEYANCE CORPORATION in their place as
11 trustee. The void *ab initio* Substitution of Trustee in the Clark County Recorder's Office is under
12 the Instrument Number 20070502-0004131 and is incorporated herewith as **Exhibit O**.

13 84. On October 15, 2007, a void *ab initio* substitution of trustee dated October 9,
14 2007 is recorded in Clarks County Recorder's office, where Fidelity National Default Solutions
15 acting on behalf of Civil Rights Conspiracy coconspirator MERS in furtherance of the
16 conspiracy acts as "present" Beneficiary and Civil Rights Conspiracy coconspirator CBSK as the
17 original Beneficiary terminate the appointment of the original trustee again, Civil Rights
18 Conspiracy coconspirator Chicago Title, and appoint Quality Loan Service Corporation a
19 substitute trustee in their place. The void *ab initio* Substitution of Trustee is recorded in the Clark
20 County Recorder's Office under the Instrument Number 20071015-0002484 and is incorporated
21 herewith as **Exhibit P**.

22 85. On June 22, 2010, in furtherance of the conspiracy and to deprive Piovo's, Civil
23 Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens,

1 Civil Rights Identification Document(s) and Information APN a void *ab initio* substitution of
2 trustee dated June 8, 2010 is recorded in Clarks County Recorder's office, where Fidelity
3 National Default Solutions acting on behalf of Bank of America National Association as
4 successor by merger to LaSalle Bank National Association as Trustee for Certificateholders of
5 Bear Sterns Asset Backed Securities I LLC, Asset-Backed Certificates, Series 2006-HE8 by
6 EMC Mortgage Corporation, its Attorney in Fact. The substitution names MERS as "nominee"
7 for Civil Rights Conspirator CBSK as the original Beneficiary and terminates the appointment of
8 the original trustee once again, Civil Rights Conspirators Chicago Title, and appoints Quality
9 Loan Service Corporation once again as a substitute trustee in its selfsame place. The void *ab*
10 *initio* Substitution of Trustee is recorded in the Clark County Recorder's Office under the
11 Instrument Number 201006220003252. The recorded substitution is incorporated herewith as
12 **Exhibit Q.**

13 86. On April 21, 2012, four years and four months after CBSK ceases to exist by the
14 order of Commissioner of Corporations of The State of California, MERS in violation of Piovo
15 Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of
16 Citizens, Civil Rights Identification Document(s) and Information APN "acting" as "nominee"
17 for Civil Rights Conspiracy coconspirator CBSK, assigns the void *ab initio* Guzman's security
18 instrument to Civil Rights Conspiracy coconspirator U.S. Bank. And in furtherance of the Civil
19 Rights Conspiracy records the said assignment in the Clark County Recorder's Office on May
20 22, 2012, under the Instrument Number 01205220001298. The assignment is incorporated
21 herewith as **Exhibit R.**

22 87. On November 21, 2012, in another violation and deprivation of Piovo's Civil
23 Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section 1982 Property Rights of Citizens,

1 Civil Rights Identification Document(s) and Information APN filed another void *ab initio*
2 substitution of trustee dated October 18, 2012 and November 2, 2012 is recorded in Clarks
3 County Recorder's office, where coconspirators and lawyers for MERS - Gerard Cox Larsen
4 purportedly acting as a Trustee on behalf of People's Choice Deed of Trust. The Substitution of
5 Trustee is in the records of the Clark County Recorder's Office under the Instrument Number
6 201211210001559. The void *ab initio* Substitution of Trustee is incorporated herewith as
7 **Exhibit S.**

8 88. Civil Rights Coconspirators MERS and their lawyers GERRARD COX LARSEN
9 (GCL) in furtherance of the Civil Rights conspiracy and in violation of acts constituting past
10 present and future federal acts that necessarily involves GERRARD COX LARSEN in
11 deprivation of Pivo of his Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section
12 1982 Property Rights of Citizens, Civil Rights Identification Document(s) and Information APN,
13 GCL an attorney firm and specifically Civil Rights Coconspirator Douglas D. Gerrard, an
14 Officer of the Court and a partner of GCL perpetrated a crime of Civil Rights Conspiracy and by
15 causing a document to be filed in the Clark's County Recorder's office wherein claiming to
16 represent People's Choice as Trustee for the People's Choice Deed of Trust and that People's
17 Choice Deed of Trust is still an effective document when in fact People's Choice Deed of Trust
18 is fully satisfied and reconveyed on August 25, 2006 and shows recording in the Clark County
19 Recorder's office on September 9, 2006, under instrument number 20060911-0000020.

20 89. The unlawful actions by coconspirator MERS and their agents listed herewith but
21 not limited to, in concert with other Civil Rights Conspiracy coconspirators known and unknown
22 constitute deliberate violations of Plaintiff's Civil Rights Act of 1866 14 Stat. 27 (1866) and 42
23 U.S.C. Section 1982 Property Rights of Citizens, Civil Rights Identification Document(s) and

1 Information APN, in doing so commits acts violating federal law when illegally and unlawfully
 2 participated in the cover up of the transfer of title and transfer of ownership of Piovo's real
 3 property.

4 **Coconspirator U.S. Bank National Association as Trustee**

5 90. Coconspirator U.S. Bank a Joint Principals Civil Rights Conspiracy
 6 Coconspirators herein, did voluntarily, knowingly, wrongfully, intentionally and inherently
 7 wrongfully willfully combine, conspire, and agree with others known and unknown to Piovo, to
 8 commit fraud, that is, to devise a scheme, by concert of action of two or more Joint Principals
 9 Coconspirators did voluntarily, knowingly, wrongfully, intentionally and inherently wrongfully
 10 willfully combine, conspire, and agree with others known and unknown to Piovo, to deprive
 11 Piovo's Property Rights of Citizens, and then subsequent to, Joint Principals Civil Rights
 12 Conspiracy Coconspirators herein, did voluntarily, knowingly, wrongfully, intentionally and
 13 inherently wrongful consciousness with a complete blatant Joseph Eugene Piovo is egregiously
 14 placed against his will in harm's way by way of identity theft, and such deprivation is: in direct
 15 violation of the Identity Theft and Assumption Deterrence Act, Identification Fraud, 18 U.S.
 16 Code Section 1028 (a) (2), the Anti Civil Rights Joint Principals Coconspirators stealing of
 17 Joseph Eugene Piovo's APN and 18 U.S.C. Section 1028 Identification Document and
 18 Information equal protection under the law automatically causes the deprivation of Joseph
 19 Eugene Piovo's free flowing, under equal protection under the laws of the United States the 18
 20 U.S. Code Section 1028 violation, and Civil Rights Act of 1866 14 STAT. 27 (1866) and 42
 21 U.S.C. Section 1982 Property Rights of Citizens are indissoluble Civil Rights Equal Protection
 22 under the law oneness intent links each act and laws to one another, by an inseparable Civil
 23 Rights act of necessity that by their indisputable least common denominator, Equal Protection

Under the Law, each their nature and scope, beyond a shadow of a doubt, necessarily attaches each their Civil Rights Equal Protection Under The Law to Joseph Eugene Piovo, instilled with every privilege of freeborn citizens, to his free flowing Civil Rights Property Rights of Citizens, in that the APN being the one and only Civil Rights Acts Identification Document and information Piovo's Civil Rights Identification Document(s) and Information beyond a reasonable doubt as the Civil Rights fiduciary duty as Property Rights of Citizens Identification Document(s) and Information, and Civil Rights Conspiracy Joint Principals Coconspirators 18 U.S.C. Section 1028 theft thereof, with the intent to in furtherance thereof by concert of action of two or more Joint Principals Coconspirators cause Government-Insured Financial Enterprises to part with money, the Joint Principals Coconspirators knowing and willful agreement to steal Joseph Eugene Piovo's Civil Rights Identification Document(s) and Information with the intent to in furtherance thereof by concert of action of two or more Joint Principal Coconspirators cause Government-Insured Financial Enterprises to part with money, involving any rights or obligations that arise from the Constitution or other federal law indissoluble links itself to (1) Joseph Eugene Piovo, (2) Civil Rights Act of 1866 14 Stat. 27 (1866) and (3) 42 U.S.C. Section 1982 Property Rights of Citizens, thus being the case as the case is all Joint Principals Coconspirators Civil Rights Conspiracy by concert of action did knowingly and willfully combine, conspire, and agree with others known and unknown to Joseph Eugene Piovo, deprive him of his Civil Rights flowing under Fourteenth Amendment to the United States Constitution equal protection under the Constitution and laws and treaties of the United States.

91. On June 22, 2010, a void *ab initio* substitution of trustee dated June 8, 2010 is recorded in Clarks County Recorder's office, where Fidelity National Default Solutions acting on behalf of Bank of America National Association as successor by merger to LaSalle Bank

1 National Association as Trustee for Certificateholders of Bear Sterns Asset Backed Securities I
2 LLC, Asset-Backed Certificates, Series 2006-HE8 by EMC Mortgage Corporation, its Attorney
3 in Fact.

4 92. Civil Rights coconspirator U.S. Bank is wrongly attempting to assert unlawful
5 interest in Plaintiff's property. Civil Rights Coconspirator U.S. Bank own no lawful interest
6 whatsoever in the Plaintiff's property.

7 93. Coconspirator U.S. Bank claims an interest in Plaintiff's property by an allegedly
8 acquired all Trust business from Bank of America N.A.

9 94. Coconspirator U.S. Bank has been served with a Notice of Pendency of Action
10 describing its own violations and the conspiracy by other Civil Rights Conspiracy
11 coconspirators, Civil Rights Conspiracy member and coconspirator U.S. Bank and their lawyers
12 failed to withdraw and continue to participate in the conspiracy and Plaintiff's Civil Rights
13 violations with others known and unknown Civil Rights Conspiracy coconspirators conspire to
14 deprive Plaintiff of his Civil Rights to acquire and retain property.

15 95. Accordingly, U.S. Bank acquired nothing from MERS on April 21, 2012, because
16 MERS did not hold lawful interest in Plaintiff's Property.

17 96. The unlawful actions by Civil Rights Coconspirator U.S. Bank and their agents
18 listed herewith but not limited to, in concert with other Civil Rights Conspiracy Coconspirators
19 known and unknown constitute deliberate violations of Piovos Civil Rights Act of 1866 14 Stat.
20 27 (1866) and 42 U.S.C. Section 1982 - Property Rights of Citizens are indissoluble Civil Rights
21 Equal Protection under the law fraud.

22 **FIRST CLAIM/CAUSE OF ACTION**

**Violations of Civil Rights Civil Rights Act of 1866 14 Stat. 27 (1866) and 42 U.S.C. Section
1982**

1. Plaintiff incorporates by reference each of the preceding paragraphs as if fully set forth in this paragraph.

2. Plaintiff seeks relief against all named and unnamed Civil Rights Conspiracy Coconspirators and other coconspirators for violations under Civil Rights Act of 1866 14 Stat. 27 (1866)) and 42 U.S.C. Section 1982.

3. As set forth above during the Civil Rights Conspiracy coconspirators in concert with other Civil Rights Conspiracy Coconspirators known and unknown constitute deliberate violations of Plaintiff's Civil Rights Act of 1866 14 Stat. 27 (1866)) and 42 U.S.C. Section 1982 in doing so commit acts violating federal law when illegally and unlawfully transfer APN, transfer title and transfer ownership of Joseph Eugene Piovo's real property resulting in deprivation of Piovo's Civil Rights Act of 1866 14 Stat. 27 (1866)) and 42 U.S.C. Section 1982.

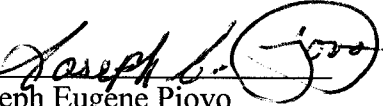
4. By reason of the foregoing, Plaintiff has been damaged in a substantial amount to be determined at trial, and is entitled to compensatory, actual and punitive damages for Joseph Eugene Piovo's Heart Attack, deprivation of Piovo's Civil Rights as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and personal property inter alia and et al emotional stress in the amount of Fifty Million Dollars (\$50,000,000.00) and to Revoke the licenses of the Civil Rights Conspiracy Coconspirator Endorsement Lenders and Civil Rights Conspiracy Coconspirator Title Company, Civil Rights Conspiracy Coconspirator attorney Colquitt's, and all other Civil Rights Conspiracy Coconspirator attorneys who voluntarily intelligently and willfully joined in the unlawful Civil Rights Conspiracy Coconspirators agreement to commit acts constituting federal Civil Rights Conspiracy violations against Joseph

1 Eugene Piovo constituting federal Civil Rights Conspiracy violations with a blatant wrongful
2 and inherently wrongful disregards for Civil Rights afforded to Joseph Eugene Piovo.

3 WHEREFORE, Plaintiff respectfully requests that judgment be entered in its favor and
4 against all Civil Rights coconspirators and defendants as follows:

- 5 a. For return of Plaintiff's Civil Rights.
- 6 b. For return of Plaintiffs Real Property;
- 7 c. For Compensatory damages;
- 8 d. For Punitive damages;
- 9 e. For Actual damages;
- 10 f. For Emotional distress;
- 11 g. For the Suffering, the Heart Attack and the Costs Incurred as a Result;
- 12 h. For Legal Fees, Court Costs;
- 13 i. For Revocation of all Licenses of all Civil Rights conspirators.

14 • Respectfully submitted by:

15 By 
16 Joseph Eugene Piovo
17 1853 Indian Bend Drive
18 Henderson, Nevada 89074
19 702-897-2602
20 viceroyuncci@gmail.com
21

22 Dated: May 27, 2014

Joseph Eugene Piovo, Sui juris
1853 Indian Bend Drive
Henderson, Nevada 89074
702-897-2602
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Joseph Eugene Piovo, Sui juris, Individually
and as Beneficiary of Vice Roy United Nations
Credit and Commerce International Blind Trust
1853 Indian Bend Drive
Henderson, Nevada 89074
APN:178-17-911-009

Plaintiff,

vs.

ROBERT STONE;
RONALD A. COLQUITT;
MICHELLE WILSON;
ANTONIETA TOVAR-GUZMAN;
SHAUNA S. BRENNAN;
CBSK FINANCIAL GROUP, INC.;
CHICAGO TITLE;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.; A/K/A
MERS;
MERSCORP HOLDINGS, INC.; A/K/A
MERSCORP, INC.;
U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE, SUCCESSOR IN INTEREST TO
BANK OF AMERICA, NATIONAL
ASSOCIATION AS SUCCESSOR BY
MERGER TO LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
CERTIFICATEHOLDERS OF BEAR
STERNS ASSET BACKED SECURITIES I
LLC, ASSET BACKED CERTIFICATES,
SERIES 2006-HE8;

Does 1-100 inclusive;

Defendants

No. 2:13-cv-01922-APG-GWF

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

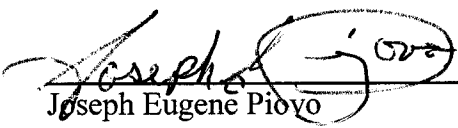
I hereby certify that on the 27th day of May, 2014, I have caused to be mailed via regular mail by the United States Postal Service the foregoing Second Amended Complaint to the following participants at the addresses listed below:

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May 27, 2014


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